

**RCRA HAZARDOUS WASTE GENERATOR
COMPLIANCE EVALUATION INSPECTION CHECKLIST**

Facility: Columbus Coated Fabrics
USEPA I.D.: 0HD004294351 HWFB No.: 01-25-0145
Street: 1280 North Grant Avenue
City: Columbus State: Ohio Zip: 43201
County: Franklin Telephone: (614) 297-6097
Owner/Operator: Borden, Inc.
Street: 180 East Broad Street
City: Columbus State: OHIO Zip: 43215
Telephone: (614) 225 - 4000

Inspection Date: 11 / 19 / 91 Time: 8: - 00 a.m.
through 11 / 22 / 91
Advance notice of inspection given? (yes) ☒ (no) ☐
If so, how far in advance? three weeks

	<u>Name</u>	<u>Agency/Title</u>	<u>Phone</u>
Inspectors:	<u>Andrew D. Kubalak</u>	<u>District Representative - Ohio EPA</u>	<u>(614) 771-7505</u>
Facility Representative:	<u>Grover Thomas</u>	<u>Environmental Manager</u>	<u>(614) 297-6097</u>
	<u>John Sykes</u>	<u>Environmental Coordinator</u>	<u>(614) 297-6097</u>

STATUS

Cond. Exempt SQG ☐ SQG ☐ Large Quantity Generator ☒
LDR Checklist Attached: (yes) ☒ (no) ☐
Included

ACTIVITIES

Containers <input checked="" type="checkbox"/>	Used oil burner <input type="checkbox"/>
Tanks <input type="checkbox"/>	Hazardous waste fuel burner/blender <input type="checkbox"/>
Wastepile <input type="checkbox"/>	Incineration/Thermal treatment <input type="checkbox"/>
Landfill <input type="checkbox"/>	Land treatment <input type="checkbox"/>
Surface Impoundment <input type="checkbox"/>	Groundwater monitoring <input type="checkbox"/>

Revised: 1/7/91

1661 08 1991

REMARKS - GENERAL INFORMATION

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling procedures:

Site Activity: Columbus Coated Fabrics (CCF) manufactures wall coverings and vinyl sheeting

Waste Handling: The numbers for the waste streams listed below coincide with the circled numbers I've placed on the attached TCLP results.

1. D002 and D007 hazardous waste is generated at the chrome plating building when rags are used to wipe muriatic acid off of copper cylinders before they are replated with chrome.
2. D002, D007 and D008 hazardous waste is generated at the chrome plating building when rags are used to wipe chrome off of the copper cylinders.
3. Pans are used to collect drippings from roller presses. D001, D007, D008, F003, F005 and K036 hazardous waste is generated when solvent is used to clean these pans.
4. D001, D007, D008, F003, F005 and K036 hazardous waste is generated from a water based pan wash operation which includes a high pressure water wash and a vacuum filter press.
5. D001, D007, D008, F003, F005 and K036 hazardous waste is generated in the ink mix room and consists of waste ink which cannot be recycled.
6. D006 (filter bag) hazardous waste is generated at the Premix process (blend tank) when all ingredients are mixed, heated, and stabilizers are added and then the mixture is run through filter bags before fluxing in the Banbury mixers.
7. D007 hazardous waste is generated when chrome wears off of rollers and copper shows through the chrome, the ink must first be removed from the roller before re-plating. CCF is currently using Ryllidone, a new solvent manufactured by Dow.

Remarks - General Information

8. Dust stop oil, classified as D006 hazardous waste, is generated at the Banbury mixers which are used for the manufacture of fire wall for automobiles.
9. and 10. F006 hazardous waste generated from the waste water pre-treatment unit in the past has been manifested to Tricil in Hilliard, Ohio. CCF is currently looking for alternate of site permitted facilities capable of accepting this waste stream
11. D002 and D007 hazardous waste generated from cleaning the copper rollers is manifested off site to Chem-Met, Wyandotte, Michigan.
12. D001, D006, D008, F003, F005 hazardous waste is generated when tubs and drums are cleaned with MEK / MIBK.

GENERATOR CLASSIFICATION (OAC 3745-52-34)

Does the facility:

1. Generate < 100 Kg (25-30 gallons) of hazardous waste in a calendar month?

(yes) _____ (no) X

If so, the facility is classified as a Conditionally Exempt Small Quantity Generator, unless 3.b. applies. Please complete the Conditionally Exempt Small Quantity Generator Requirements checklist.

2. Generate between 100 and 1000 Kg of hazardous waste in a calendar month? (about 25 to under 300 gallons)

(yes) _____ (no) X

If so, the facility is classified as a Small Quantity Generator, unless 3.b. applies. Please stop here and complete the Small Quantity Generator Requirements checklist.

3. a. Generate > 1000 Kg (~ 300 gallons) of hazardous waste in a calendar month?

OR;

- b. Generate > 1 Kg of acutely hazardous waste in a calendar month?

(yes) X (no) _____

If so, the facility is classified as a Large Quantity Generator. Please complete the Large Quantity Generator Requirements checklist.

REMARKS - GENERATOR CLASSIFICATION

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OAC 3745-52 - LARGE QUANTITY GENERATOR REQUIREMENTS

WASTE EVALUATION (OAC 3745-52-11)

Y/N/NA RMK #

1. Have wastes generated at the facility been evaluated in compliance with the waste evaluation requirements of OAC rule 3745-52-11(A)(B) and (C)?

Y

If not, specify those waste streams which the generator has failed to adequately evaluate:

2. Are any wastes generated at the facility identified by the generator as being excluded from regulation under Rule 3745-51-04?

N

If so, specify those waste streams identified by the generator as being excluded under 3745-51-04:

3. Is the facility generating any wastes which are identified as recyclable materials as defined in OAC 3745-51-06?

N

If so, please identify these waste streams below:

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4. Is the generator recycling any materials on-site by:
- Using or reusing the material as an ingredient in an industrial process to make a product?
 - If so, is the material being reclaimed before it is used or reused?
 - Using the material as a substitute for commercial products?
 - Returning the material to the original process from which it was generated as a substitute for a raw material feedstock?
 - If so, is the material reclaimed before returning to the original process?

Y _____
N _____
Y _____
N _____
N/A _____

Please identify those materials that the generator is recycling as described in 4.a., 4.b. and/or 4.c. below: Banbury area waste mixture consisting of mixer scrapings, Banbury oil residue and floor sweeping is used as a raw material substitute for plasticizers and fillers for the production of fire wall.

5. Has the generator identified any waste treatment activity as being excluded from regulation because of totally enclosed treatment or via operation of an elementary neutralization unit and/or wastewater treatment unit as described in Rule 3745-65-01?

Y _____

If so, specify those waste treatment activities which the generator has identified as being excluded from regulation: CCF operates an electroplating shop where copper and chrome are electroplated onto steel cylinders. The electroplating operation generates an F006 waste from the wastewater pre-treatment unit.

6. Are Land Disposal Restricted (LDR) wastes being generated? If so, complete the Land Disposal Restriction Checklist.

Y _____

GENERATOR IDENTIFICATION NUMBER (OAC 3745-52-12)

7. Prior to treating, storing, disposing, transporting or offering to transport hazardous waste, has the generator obtained a generator identification number from USEPA as required by 3745-52-12?

Y _____

GENERATOR ANNUAL REPORT (OAC 3745-52-41)

8. Has the generator filed annual reports to the Director on or before March 1st of each calendar year as required by 3745-52-41?

Y _____

HAZARDOUS WASTE IMPORT/EXPORT (OAC 3745-52-50 TO 3745-52-57
AND OAC 3745-52-60)

Y/N/NA RMK #

9. Does the generator import or export hazardous waste? N/A

If so, are the wastes handled in accordance with the
requirements of 3745-52-50 through 3745-52-57 and
3745-52-60? N/A

REMARKS - HAZARDOUS WASTE IMPORT/EXPORT

PRE-TRANSPORT REQUIREMENTS (OAC 3745-52-30 TO 3745-52-33)

Y/N/NA RMK #

10. Does the generator meet the following pre-transport
requirements prior to offering hazardous wastes for
transport off-site:

a. The waste material is packaged, labeled, and marked
in accordance with the applicable DOT regulations
[3745-52-30, 3745-52-31, and 3745-52-32]? Y

b. Each container with a capacity of 110 gallons or less
is affixed with a completed hazardous waste label as
required by 3745-52-32? Y

c. The generator meets the requirements for proper DOT
placarding or offers the appropriate DOT placards to
the initial transporter in compliance with 3745-52-33? Y

REMARKS - PRETRANSPORT REQUIREMENTS

MANIFEST REQUIREMENTS (OAC 3745-52-20 TO 3745-52-23)

Y/N/NA RMK #

1. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:
 - a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, USEPA form 8700-22 in compliance with 3745-52-20(A)? Y _____
 - b. The manifest contains all information required by 3745-52-20 and the minimum number of copies required by 3745-52-22? Y _____
 - c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20(C)(D)(E)? Y _____
 - d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23 (A)(1)(2)? Y _____
2. Has the generator received a return copy of each completed manifest within thirty-five (35) days of the date the waste was accepted by the initial transporter? Y _____
 - a. If not, has the generator complied with the Manifest Exception reporting requirements in 3745-52-42? N/A _____
3. Are signed copies of all hazardous waste manifests and any documentation required for Exception Reports retained for at least 3 years as required by 3745-52-40? Y _____

REMARKS - MANIFEST REQUIREMENTS

GENERATOR CLOSURE REQUIREMENTS (3745-52-34)

Y/N/NA RMK #

1. Has the generator closed any < 90-day accumulation unit(s) since date of last inspection?

N

If so, describe the unit(s) which the generator has closed:

2. If the generator has closed any < 90-day accumulation unit(s) as described in Question #1, was closure completed to meet the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]

N/A

Please provide a description of the type of documentation provided by the generator to confirm that closure was completed in accordance with the closure performance standard:

REMARKS - GENERATOR CLOSURE REQUIREMENTS

PERSONNEL TRAINING (OAC 3745-65-16)

Y/N/NA RMK #

1. Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency procedures, and implementation of the contingency plan? [3745-52-34(A)(4)]
2. Does the generator provide Personnel Training to new employees within 6 months after the date of employment as required by 3745-65-16(B)? [3745-52-34(A)(4)]
3. Does the generator provide an annual refresher training course as required by 3745-65-16(B)? [3745-52-34(A)(4)]
4. Does the generator keep all the records required by 3745-65-16(D)(E) including; written job titles, job descriptions and documented employee training records? [3745-52-34(A)(4)]

Y _____
Y _____
Y _____
Y _____

REMARKS - PERSONNEL TRAINING REQUIREMENTS

CONTINGENCY PLAN (OAC 3745-65-50 THROUGH 3745-65-56)

Y/N/NA RMK #

1. Does the o/o have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components: [3745-65-52(A)(B)(C)(D)(E)]
 - a. Actions to be taken by personnel in the event of an emergency? Y
 - b. Arrangements or agreements with local or state emergency authorities? Y
 - c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator? Y
 - d. A list of all emergency equipment including location, physical description and outline of capabilities? Y
 - e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)]? Y
2. Is the Contingency Plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste or hazardous waste constituents to air, soil or surface water? [3745-65-51(A)] Y
3. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has the plan been submitted to all local and state emergency authorities that might be required to participate in execution of the plan? [3745-65-53(A)(B)] Y
4. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] Y
5. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-55] Y

The Contingency Plan is currently being revised and will be ready for use in December, 1991.

Y/N/NA RMK #

6. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications necessary under 3745-65-56(A-J)?

N/A

REMARKS - CONTINGENCY PLAN REQUIREMENTS

PREPAREDNESS AND PREVENTION (OAC 3745-65-30 TO 3745-65-37)

Y/N/NA RMK #

1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] Y _____
2. Has there been a fire, explosion or non-planned release of waste at the facility since date of last inspection? Y _____
 - a. If yes, was the contingency plan implemented? [3745-65-51(B)] N/A _____
3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)]
 - a. Internal alarm system? Y _____
 - b. Access to telephone, radio or other device for summoning emergency assistance? Y _____
 - c. Portable fire control equipment, spill control and decontamination equipment? Y _____
 - d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers? Y _____
4. Is all required spill control and decontamination equipment, fire and communications equipment tested on a weekly basis and maintained as necessary? [3745-65-33] Y _____
 - a. Does the facility keep an equipment testing log required by 3745-65-33(B), including date and time of test, observations made, and date and nature of any repairs? Y _____
5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] Y _____
6. If required due to the actual hazards associated with the waste, is adequate aisle space maintained to allow unobstructed movement of emergency or spill control equipment? [3745-65-35] Y _____
7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with possible hazards and facility layout? [3745-65-37(A)] Y _____

Y/N/NA RMK #

8. Where state and local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented?
[OAC 3745-65-37(B)]

N/A

REMARKS - PREPAREDNESS AND PREVENTION REQUIREMENTS

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GENERATOR ACCUMULATION IN CONTAINERS AND TANKS
(OAC 3745-52-34)

Y/N/NA RMK #

1. If the generator elects to accumulate hazardous waste on-site in containers or tanks for 90 days or less without a permit as provided under 3745-52-34, are the following requirements met:

- a. The containers or tanks are clearly marked with the words "Hazardous Waste"? [OAC 3745-52-34(A)(3)] Y _____
b. The date that accumulation began is clearly marked on each container? [OAC 3745-52-34(A)(2)] Y _____

In addition, OAC 3745-52-34(A)(1) also requires generators accumulating hazardous waste(s) in containers < 90 days to comply with the "Container Management" Rules of OAC 3745-66-70 to 3745-66-77. If the generator is accumulating hazardous waste(s) in containers, please complete Management of Containers checklist to document compliance with these requirements.

2. Is the generator accumulating hazardous waste(s) in tanks? N _____

If so, OAC 3745-52-34(A)(1) requires generators to comply with Rules 3745-66-90 to 3745-66-992 except Paragraph (c) of rule 3745-66-97 and rule 3745-66-991.

If the generator is accumulating hazardous waste(s) in tanks, complete the Storage and Treatment in Tanks checklist to document compliance with these requirements.

3. Has the generator accumulated hazardous wastes in excess of ninety (90) days? Y *

- a. If so, has the generator been granted an extension by the Director for accumulation in excess of (90) days? N/A _____

REMARKS - GENERATOR ACCUMULATION REQUIREMENTS

* The waste streams accumulated ^{over 90 days} are found in CCF's Permit.

SATELLITE ACCUMULATION AREA REQUIREMENTS
(OAC 3745-52-34(C))

Y/N/NA RMK #

1. Has the facility elected to accumulate hazardous waste at or near a point of generation which is under the control of the operator of the process generating the waste? (defined as satellite accumulation)

Y

If so, are the following requirements of OAC 3745-52-34(C) being met:

- a. Quantities of waste accumulated do not exceed 55 gallons at any time?
- b. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time?
- c. The generator has marked the containers with words "Hazardous Waste" or with other words identifying the contents of the container?

Y

N/A

Y

*

If the facility is maintaining satellite accumulation areas as identified in 1.a. and 1.b. above, OAC 3745-52-34(C) also requires that the container(s) in these areas be managed in compliance with the "Container Management" requirements of OAC 3745-66-71, 3745-66-72, 3745-66-73(A), 3745-66-76 and 3745-66-77. Please complete the Use and Management of Containers checklist to document compliance with these requirements.

2. Is the facility accumulating hazardous waste(s) in excess of the amounts listed in either 1.a or 1.b?

Y

- a. If so, did the generator comply with 3745-52-34(A) within three (3) days? and;

Y

- b. Upon accumulating > 55-gallons of waste, did the generator mark the container holding the excess hazardous waste with the date the excess began accumulating?

Y

REMARKS - SATELLITE ACCUMULATION REQUIREMENTS

* Hazardous waste label placed on containers initially.

USE AND MANAGEMENT OF CONTAINERS (OAC 3745-66-70 TO 3745-66-77)

Y/N/NA RMK #

- | | | | |
|----|--|------------|---------------------------------------|
| 1. | Are hazardous wastes stored in containers which are: | | |
| | a. Closed? [3745-66-73(A)] | <u>Y</u> | <u> </u> |
| | b. In good condition? [3745-66-71] | <u>Y</u> | <u> </u> |
| | c. Compatible with wastes stored in them? [3745-66-72] | <u>Y</u> | <u> </u> |
| 2. | Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] | <u>Y</u> | <u> </u> |
| 3. | Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] | <u>Y</u> | <u> </u> |
| 4. | Is the area where containers are stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] | <u>Y</u> | <u>inspections
made
daily</u> |
| 5. | Is the facility recording inspections described in Question #4 in an inspection log or inspection summary as required by OAC 3745-66-74(B) which contains the following information: | | |
| | a. Date and time of inspections? | <u>Y</u> | <u> </u> |
| | b. Name of inspector? | <u>Y</u> | <u> </u> |
| | c. Notation of observations made during the inspection? | <u>Y</u> | <u> </u> |
| | d. The date and nature of any repairs or other remedial action? | <u>Y</u> | <u> </u> |
| 6. | Are ignitable and/or reactive hazardous waste(s) being managed at the facility? If so, | <u>Y</u> | <u> </u> |
| | a. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] | <u>Y</u> | <u> </u> |
| | b. Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] | <u>N/A</u> | <u> </u> |

REMARKS - CONTAINER MANAGEMENT REQUIREMENTS

TOXICITY CHARACTERISTIC (TC) RULE REQUIREMENTS

WASTE EVALUATION (GENERATOR REQUIREMENT)

Y/N N/A RMK#

1. Has the generator evaluated all wastes to determine if they exhibit any of the toxicity characteristics as defined in 40 CFR 262.247 [40 CFR 262.11]

Y

- (a) Did the generator use knowledge of the process to determine if wastes exhibit any of the toxicity (TC) characteristics? OR;

Y

*

- (b) Did the generator obtain a chemical analysis of the wastes to determine if the wastes demonstrate any of the toxicity (TC) characteristics?

Y

**

NOTE: If the generator has obtained a chemical TC analysis of the wastes, please attach a copy of the analytical results to this checklist.

2. Please identify which of the following TC wastes are being managed at the facility:

TC METAL WASTES

<u> </u> D004 (Arsenic)	<u>X</u> D007 (Chromium)	<u> </u> D010 (Selenium)
<u> </u> D005 (Barium)	<u>X</u> D008 (Lead)	<u> </u> D011 (Silver)
<u>X</u> D006 (Cadmium)	<u> </u> D009 (Mercury)	

TC PESTICIDE WASTES

<u> </u> D012 (Endrin)	<u> </u> D014 (Methoxychlor)	<u> </u> D016 (2,4-D)
<u> </u> D013 (Lindane)	<u> </u> D015 (Toxaphene)	<u> </u> D017 (2,4,5-TP)

TC ORGANIC WASTES

<u> </u> D018 (Benzene)	<u> </u> D031 (Heptachlor)
<u> </u> D019 (Carbon tetrachloride)	<u> </u> D032 (Hexachlorobenzene)
<u> </u> D020 (Chlordane)	<u> </u> D033 (Hexachlorobutadiene)
<u> </u> D021 (Chlorobenzene)	<u> </u> D034 (Hexachloroethane)
<u> </u> D022 (Chloroform)	<u> </u> D035 (Methyl ethyl ketone)
<u> </u> D023 (o-Cresol)	<u> </u> D036 (Nitrobenzene)
<u> </u> D024 (m-Cresol)	<u> </u> D037 (Pentachlorophenol)
<u> </u> D025 (p-Cresol)	<u> </u> D038 (Pyridine)
<u> </u> D026 (Cresol)	<u> </u> D039 (Tetrachloroethylene)
<u> </u> D027 (1,4-Dichlorobenzene)	<u> </u> D040 (Trichloroethylene)
<u> </u> D028 (1,2-Dichloroethane)	<u> </u> D041 (2,4,5-Trichlorophenol)
<u> </u> D030 (2,4-Dinitrotoluene)	<u> </u> D042 (2,4,6-Trichlorophenol)
	<u> </u> D043 (Vinyl chloride)

* YES, for all waste streams

** TC pesticide wastes are not analyzed for based on generator knowledge of the process and the waste streams.

3. Please identify below, how the facility is managing TC hazardous wastes:

GENERATOR ACCUMULATION (< 90 DAYS)	STORAGE (> 90 DAYS)	ON-SITE TREATMENT	ON-SITE DISPOSAL
<input checked="" type="checkbox"/> Container	<input type="checkbox"/> Container	<input type="checkbox"/> Tank	<input type="checkbox"/> Injection Well
<input type="checkbox"/> Tank	<input type="checkbox"/> Tank	<input type="checkbox"/> Incinerator	<input type="checkbox"/> Surface
	<input type="checkbox"/> Waste Pile	<input type="checkbox"/> Other	<input type="checkbox"/> Impoundment
	<input type="checkbox"/> Surface		<input type="checkbox"/> Land Application
	<input type="checkbox"/> Impoundment		

PART A APPLICATION REQUIREMENTS

Y/N N/A RMK#

4. For TSD facilities: Does the company have available, a copy of its Part A permit application which has been revised to reflect TC waste codes?

N/A *

If so, please obtain a copy and attach to this checklist.

5. If the company does not have a revised Part A available, does the facility representative indicate that a revised Part A application has been filed with U.S. EPA?

N/A _____

RECORDKEEPING REQUIREMENTS

6. Is the owner/operator in compliance with the 40 CFR Part 264 and Part 265 recordkeeping requirements applicable to the management of TC waste?

Y _____

If not, please identify below the specific 40 CFR violations or potential 40 CFR violations occurring:

* The TC metal wastes generated at CCF (D006, D007 and D008) are not stored greater than ninety days. It should be noted that CCF has an Ohio Part A Interim Status Permit which includes the TC waste codes noted on page one, number two of this checklist.

The only hazardous wastes which have been stored for greater than ninety days (during the last fourteen months) are F003, F005 and F006.

STRUCTURAL/OPERATING REQUIREMENTS

Y/N N/A RMK#

7. Is (are) the unit(s) used to manage TC hazardous waste in compliance with the structural and operating requirements of 40 CFR Part 264 and Part 265?

Y _____

If not, please identify below the specific 40 CFR violations or potential 40 CFR violations occurring:

OPERATION/MAINTENANCE REQUIREMENTS

Y/N N/A RMK#

8. Is the owner/operator complying with 40 CFR Part 264 and Part 265 operation and maintenance requirements to ensure the proper management of TC hazardous wastes?

Y _____

If not, please identify below the specific 40 CFR violations or potential 40 CFR violations occurring:

OAC CHAPTER 3745-59 (40 CFR PART 268) - LDR GENERAL REQUIREMENTS

CASE-BY-CASE EXTENSIONS

Y/N/NA RMK#

1. Has the entity received an extension for compliance with land disposal restrictions from US EPA in accordance with O.A.C. Rule 3745-59-05 (40 CFR 268.5)? If yes,

N/A

(a) List the waste(s) affected:

- (b) Has such an extension been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-05(C)]

N/A

(c) When does the extension expire? _____

NOTE: A case-by-case extension can be granted for up to one year. The extension is renewable once (by US EPA) for an additional year.

VARIANCE FROM A TREATMENT STANDARD

2. Has the entity been granted a variance from an LDR treatment standard by US EPA as allowed by O.A.C. Rule 3745-59-44 (40 CFR 268.44)? If yes,

N/A

(a) List the waste(s) affected:

- (b) Has the petition been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-44(C)]

N/A

NOTE: Until the extension or variance identified in Questions 1 or 2 has been recognized by the Director of the Ohio EPA, the entity must continue to manage the waste in compliance with the LDR requirements. [See O.A.C. Rules 3745-59-05(C) and 3745-59-44(C)]

NO MIGRATION PETITION

Y/N/NA RMK#

3. Has the entity petitioned US EPA for a variance to allow for continued land disposal of untreated LDR wastes based upon a demonstration that there will be no migration from the disposal unit as specified in O.A.C. Rule 3745-59-06 (40 CFR 268.6)?

N

If yes,
(a) List the waste(s) affected:

- (b) Has the entity's "no migration" demonstration been approved by US EPA?

N/A

NOTE: Until receiving approval of the petition by US EPA, the entity must comply with all LDR requirements applicable to the petitioned waste(s). No approval or recognition of the petition by the Director of the Ohio EPA is required. [O.A.C. Rule 3745-59-06; 40 CFR 268.6]

PROHIBITION AGAINST DILUTION

4. In compliance with O.A.C. Rule 3745-59-03 (40 CFR 268.3), does the entity prohibit the dilution of a restricted waste or treatment residue from a restricted waste:

(a) As a substitute for adequate treatment to achieve compliance with LDR treatment standards?

Y

(b) To circumvent the effective date of a prohibition (e.g. to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)?

Y

(c) To otherwise avoid a prohibition in O.A.C. Rules 3745-59-30 through 3745-59-33? (40 CFR 268.30 through 268.33)

Y

(d) To otherwise avoid a prohibition imposed by Section 3004 of RCRA?

Y

NOTE: Dilution of wastes is permissible under the following conditions:

- i. The entity dilutes a characteristic only hazardous waste in a wastewater treatment system which treats wastes subsequently discharged pursuant to a permit issued under section 402 of Clean Water Act or which treats wastes for purposes of pretreatment under section 307 of the Clean Water Act; and,
- ii. No other method of treatment has been specified as the treatment standard for the waste. (See 40 CFR 268.3)

LDR - GENERATOR REQUIREMENTS

NOTE: The following requirements apply only to large quantity generators and small quantity generators. Conditionally exempt small quantity generators are exempt from land disposal restriction requirements as referenced in O.A.C. Rules 3745-59-01(C) (3) (40 CFR 261.8(e) (1)) and 3745-51-05(B) (40 CFR 261.5(b)).

EVALUATION OF WASTES/DETERMINING APPROPRIATE TREATMENT STANDARDS

Y/N/NA RMK#

1. Has the generator adequately evaluated all wastes generated to determine if the wastes are restricted from land disposal under O.A.C. Chapter 3745-59 (40 CFR Part 268)? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]

Y _____
- (a) For determinations based solely on knowledge of the waste: Is supporting data used to make this determination being retained on-site? [O.A.C. Rule 3745-59-07(A) (5); 40 CFR 268.7(a) (5)]

Y _____
- (b) For determinations based upon analytical testing of the waste: Is a copy of waste analysis data being retained on-site? [O.A.C. Rule 3745-59-07(A) (5); 40 CFR 268.7(a) (5)]

Y _____
2. Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g. wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)?

Y _____
3. Has the generator determined if restricted wastes meet or exceed treatment standards? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]

Y _____

REMARKS

4. Does the generator generate waste mixtures that are subject to two or more different treatment standards? If so, Y
- (a) For mixed waste streams containing two or more concentration based treatment standards: Has the generator applied the more stringent treatment standard as the treatment standard for the mixture? [O.A.C. Rules 3745-59-41(B) and 3745-59-43(B); 40 CFR 268.41(b) and 268.43(b)] Y
5. Does the facility generate any listed waste(s) which are restricted from land disposal? If so, Y
- (a) Do such wastes also exhibit hazardous waste characteristics as identified in 40 CFR 262.117? Y
- (b) For listed wastes which also exhibit characteristic(s), does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [40 CFR 268.9] Y

TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE

6. Does the generator treat any characteristic hazardous waste(s) in a RCRA-exempt unit to render such wastes non-hazardous? If so, N
- (a) Are treated waste(s) sent to a licensed solid waste disposal facility? If so, N/A
- i. With each shipment of waste, does the generator submit a notification and certification to the Regional Administrator which contains the following information:
- a. Name and address of the solid waste facility receiving the waste? [40 CFR 268.9(d)(1)(i)]
- b. A description of the waste as initially generated, including EPA hazardous waste numbers and the treatability group? [40 CFR 268.9(d)(1)(ii)]
- c. The treatment standards applicable at the initial point of generation? [40 CFR 268.9(d)(1)(iii)]
- ii. Is the certification signed by an authorized representative and does it contain the language in 40 CFR 268.7(b)(5)(i)? [40 CFR 268.9(d)(2)]

NOTE: An example of a RCRA-exempt unit would include an elementary neutralization unit or a wastewater treatment unit as defined by O.A.C. Rule 3745-50-10. [See O.A.C. Rule 3745-65-01]

NOTIFICATION/CERTIFICATION

Y/N/NA RMK#

7. For wastes that do not meet treatment standards: Does the generator notify the treatment or storage facility receiving the wastes, in writing, that wastes being received do not meet treatment standards? [O.A.C. Rule 3745-59-07(A) (1); 40 CFR 268.7(a) (1)] Y
- (a) Is such notification provided with each shipment of waste? [O.A.C. Rule 3745-59-07(A) (1); 40 CFR 268.7(a) (1)] Y
- (b) Does the notification contain the following information:
- i. EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A) (1) (a); 40 CFR 268.7(a) (1) (i)] Y
- ii. Appropriate treatment standard for each waste? [O.A.C. Rule 3745-59-07(A) (1) (b); 40 CFR 268.7(a) (1) (ii)] Y
- iii. The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A) (1) (c); 40 CFR 268.7(a) (1) (iii)] Y
- iv. Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A) (1) (d); 40 CFR 268.7(a) (1) (iv)] Y
8. For wastes that meet treatment standards: Does the generator submit a written notice and certification to the treatment, storage or disposal facility receiving the waste stating that the wastes being received meet applicable treatment standards? [O.A.C. Rule 3745-59-07(A) (2); 40 CFR 268.7(a) (2)] N/A
- If so, does the notice include the following information:
- (a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A) (2) (a) (i); 40 CFR 268.7(a) (2) (i) (A)]
- (b) The corresponding treatment standards and applicable prohibitions for the waste? [O.A.C. Rule 3745-59-07(A) (2) (a) (ii); 40 CFR 268.7(a) (2) (i) (B)]
- (c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A) (2) (a) (iii); 40 CFR 268.7(a) (2) (i) (C)]
- (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A) (2) (a) (iv); 40 CFR 268.7(a) (2) (i) (D)]
- (e) Is the certification signed by the generator or an authorized representative? [O.A.C. Rule 3745-59-07(A) (2) (b); 40 CFR 268.7(a) (2) (ii)]

9. For wastes subject to a case-by-case extension, an exemption or a variance: Does the generator provide a written notice to the facility receiving the waste that the waste is not prohibited from land disposal? [O.A.C. Rule 3745-59-07(A) (3); 40 CFR 268.7(a) (3)]

N/A

If so, does the notice contain the following information:

- (a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07 (A) (3) (a); 40 CFR 268.7(a) (3) (i)]
 - (b) The corresponding treatment standard and applicable prohibitions? [O.A.C. Rule 3745-59-07(A) (3) (b); 40 CFR 268.7(a) (3) (ii)]
 - (c) The manifest number associated with the shipment of waste? [O.A.C. 3745-59-07(A) (3) (c); 40 CFR 268.7(a) (3) (iii)]
 - (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A) (3) (d); 40 CFR 268.7(a) (3) (iv)]
 - (e) The date the waste is subject to the prohibitions? [O.A.C. Rule 3745-59-07(A) (3) (e); 40 CFR 268.7(a) (3) (v)]
10. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least five years? [3745-59-07(A) (6); 40 CFR 268.7(a) (6)]

Y

REMARKS

LDR - TREATMENT FACILITY REQUIREMENTS

REQUIRED TREATMENT

Y/N/NA **CHK**

1. Does the facility treat any restricted wastes for which a treatment standard based upon a treatment technology has been established?

N/A

(a) If so, is the facility using the appropriate treatment technology as specified in O.A.C. 3745-59-42 (40 CFR 268.42)?

(b) If not, has US EPA granted the facility approval to use an alternative treatment method other than the required technology? [3745-59-42(B) and 40 CFR 268.42(b)]

2. Does the facility treat restricted wastes for which a concentration based treatment standard has been established?

If so, does the treatment facility test its waste treatment residues according to the following requirements:

(a) For wastes with treatment standards expressed as a concentration in the waste extract (OAC 3745-59-41; 40 CFR 268.41):

Following treatment, does the treatment facility test the treatment residues or an extract of such residues using the TCLP test to assure that the residues or extract meet the applicable treatment standard? [3745-59-07(B) (1); 268.7(b) (1)]

(b) For wastes with treatment standards expressed as concentrations in the waste (OAC 3745-59-43; 40 CFR 268.43):

Does the treatment facility test the treatment residues (not an extract of such residues) using a total constituent analysis to assure that the residues meet applicable treatment standards? [3745-59-07(B) (3); 40 CFR 268.7(b) (3)]

✓

NOTE: A treatment facility may use any treatment method available (except impermissible dilution) to treat restricted wastes which have concentration based treatment standards (unless the waste is a mixture which includes wastes with concentration based treatment standards and technology based treatment standards - in which case the technology based treatment standard must be used).

OFF-SITE SHIPMENTS - NOTIFICATION/CERTIFICATION REQS.

Y/N/NA **RMK**

3. For all restricted wastes: Does the treatment facility have hazardous waste and/or treatment residues shipped off-site for land disposal? N/A

If so, does the treatment facility provide the land disposal facility with a written notice containing the following information:

- (a) EPA hazardous waste number? [3745-59-07(B) (4) (a); 268.7(b) (4) (i)]
- (b) The corresponding treatment standards and applicable prohibitions for each waste? [3745-59-07(B) (4) (b); 268.7(b) (4) (ii)]
- (c) The manifest number associated with the shipment of waste? [3745-59-07(B) (4) (c); 268.7(b) (4) (iii)]
- (d) Waste analysis data, where available? [3745-59-07(B) (4) (d); 268.7(b) (4) (iv)]

4. Does the facility have any wastes and/or treatment residues shipped off-site for disposal which have been generated from treatment of a restricted waste to meet treatment standards? If so,

For wastes and/or treatment residues which have been generated from treatment of a waste which has a **concentration based treatment standard**:

- (a) Does the treatment facility also submit a written certification with each shipment of waste or treatment residue stating that the waste has been treated in compliance with applicable treatment standards? [3745-59-07(B) (5); 268.7(b) (5)]
- (b) Does the certification contain the language as required by O.A.C. Rule 3745-59-07(B) (5) (a); 40 CFR 268.7(b) (5) (i)]

For wastes and/or treatment residues which have been generated from treatment of a waste which has a **technology based treatment standard**:

- (c) With each shipment of treatment residue shipped off-site for disposal, does the treatment facility submit a certification stating that the residue has been treated in accordance with the appropriate treatment technology as specified in O.A.C. Rule 3745-59-42 (40 CFR 268.42) [3745-59-07(B) (5) (b); 40 CFR 268.7(b) (5) (ii)]
- (d) Is the certification signed by an authorized representative and does it contain the language as specified in O.A.C. 3745-59-07(5) (b) (ii) (40 CFR (b) (5) (ii))?

5. Does the treatment facility have wastes shipped off-site that do not meet treatment standards and/or wastes that must be further managed at a different treatment or storage facility? If so,

(a) Is the facility complying with the generator notification and certification requirements of O.A.C. Rule 3745-59-07 (40 CFR 268.7)? [3745-59-07(B)(6); 268.7(b)(6)]

N/A

TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE (40 CFR 268.9)

6. Does the facility treat any characteristic hazardous waste(s) to render such wastes non-hazardous? If so,

(a) Are treated waste(s) sent to a licensed solid waste disposal facility? If so,

i. With each shipment of waste, does the facility submit a notification and certification to the Regional Administrator which contains the following information:

a. Name and address of the solid waste facility receiving the waste? [40 CFR 268.9(d)(1)(i)]

b. A description of the waste as initially generated, including EPA hazardous waste numbers and the treatability group? [40 CFR 268.9(d)(1)(ii)]

c. The treatment standards applicable at the initial point of generation? [40 CFR 268.9(d)(1)(iii)]

(b) Is the certification signed by an authorized facility representative and does it contain the language found in 40 CFR 268.7(b)(5)(1)? [40 CFR 268.9(d)(2)]

REMARKS

LDR - LAND DISPOSAL FACILITY REQUIREMENTS

Y/N/NA RMK#

1. Does the land disposal facility retain copies of notices and certifications required by O.A.C. Rule 3745-59-07(A) or (B) (40 CFR 268.8(a) or (b)) and O.A.C. Rule 3745-59-08 (40 CFR 268.8)? [O.A.C. Rule 3745-59-07(C) (1); 40 CFR 268.7(c) (1)]
2. Does the land disposal facility test the waste or an extract of the waste or treatment residue received in accordance with the facility's waste analysis plan to assure that the wastes or treatment residues are in compliance with applicable treatment standards? [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)]
3. Does the land disposal facility prohibit the disposal of restricted wastes or treatment residues which exceed the concentration based treatment standards of O.A.C. Rules 3745-59-41 (40 CFR 268.41) or 3745-59-43 (40 CFR 268.43)? [O.A.C. Rule 3745-59-40(A), (C); 40 CFR 268.40(a), (c)]
4. Does the land disposal facility prohibit the disposal of any restricted wastes or treatment residues before such wastes have been treated using the technology required by O.A.C. Rule 3745-59-42(A) (40 CFR 268.42(a))? [O.A.C. Rule 3745-59-40(B); 40 CFR 268.40(b)]

N/A	

REMARKS

TREATMENT OF LDR WASTES IN SURFACE IMPOUNDMENTS

Y/N/NA ~~XXX~~

1. Does the owner/operator treat wastes which are prohibited from land disposal in a surface impoundment or series of impoundments? If so, are the following conditions met:
- | | N/A | |
|--|-----|--|
| (a) The residues from treatment are analyzed to determine if they meet applicable treatment standards? [O.A.C. Rule 3745-59-04(A) (2) (a); 40 CFR 268.4(a) (2) (i)] | | |
| (b) The sampling method is designed so that representative samples of the sludge and the supernatant are tested separately rather than mixed to form homogeneous samples? [O.A.C. Rule 3745-59-04(A) (2) (a); 40 CFR 268.4(a) (2) (i)] | | |
| (c) Treatment residues (including any liquid waste) which do not meet treatment standards or prohibition levels are removed from the impoundment at least annually? [O.A.C. Rule 3745-59-04(A) (2) (b); 40 CFR 268.4(a) (2) (ii)] | | |
| i. Such residues are not placed in any other surface impoundment? [O.A.C. Rule 3745-59-04(A) (2) (c); 40 CFR 268.4(a) (2) (iii)] | | |
| (d) Procedures and schedules for sampling the impoundment contents, analysis of test data and removal of residues which do not meet treatment standards have been established? [O.A.C. Rule 3745-59-04(A) (2) (d); 40 CFR 268.4(a) (2) (iv)] | | |
| i. Such procedures and schedules are specified in the facility's waste analysis plan as required by O.A.C. Rules 3745-65-13 (40 CFR 265.13) or 3745-54-13 (40 CFR 264.13)? [O.A.C. Rule 3745-59-04(A) (2) (d); 40 CFR 268.4(a) (2) (iv)] | | |
| ii. A copy of the waste analysis plan has been submitted to the Director? [O.A.C. Rule 3745-59-04(A) (4); 40 CFR 268.4(a) (4)] | | |
| (e) The impoundment meets the design requirements of O.A.C. Rule 3745-56-21(C) (40 CFR 264.221(c)) or 3745-67-21(A) (40 CFR 265.221(a))? [O.A.C. Rule 3745-59-04(A) (3); 40 CFR 268.4(a) (3)] | | |
| (f) The impoundment meets groundwater monitoring requirements (unless exempt from such requirements)? [O.A.C. Rule 3745-59-04(A) (3); 40 CFR 268.4(a) (3)] | | |

Y/N/NA RMK#

- (g) The owner/operator has submitted a written certification to the Director (Regional Administrator) which states that the surface impoundment meets the above requirements referenced in Questions 1(a) through (f)? [O.A.C. Rule 3745-59-04(A)(4); 40 CFR 268.4(a)(4)]

N/A _____

REMARKS

STORAGE OF LAND DISPOSAL RESTRICTED WASTES

NOTE: The following questions apply to operators of treatment, storage or disposal (TSD) facilities that accumulate Land Disposal Restricted wastes that do not meet treatment standards in tanks or containers. A large quantity generator who stores LDR wastes on-site for greater than 90 days becomes an operator of a storage facility and must comply with all applicable TSD requirements. SQGs become owners/operators of storage facilities if storage of LDR wastes exceeds 6,000 kg. or 180/270 days.

NOTE: The LDR storage prohibition does not apply to wastes which are subject to a national capacity variance, variance from the treatment standard or case-by-case extension during the period of extension/variance. The LDR storage prohibition also does not apply to wastes subject to a no-migration petition or to wastes which meet treatment standards. [O.A.C. Rule 3745-59-50(E); 40 CFR 268.50(e)]

		Y/N/NA	RMK#
1.	Is the owner/operator storing land disposal restricted wastes in containers? If so, is each container marked ^{with} the following information in accordance with O.A.C. Rule 3745-59-50(A) (2) (a) (40 CFR 268.50(a) (2) (i)):	Y	
	(a) The identification of the contents?	Y	
	(b) With the date which accumulation began?	Y	
2.	Is the owner/operator storing land disposal restricted wastes in tanks? If so, is each tank marked with the following information in accordance with O.A.C. Rule 3745-59-50(A) (2) (b) (40 CFR 268.50(a) (2) (ii)):	N/A	
	(a) A description of its contents?		
	(b) The quantity of each hazardous waste received?		
	(c) The date each period of accumulation begins? or;		
	(d) Is the information required by 2(a), 2(b) and 2(c) being recorded and maintained in the facility's operating record? [O.A.C. Rule 3745-59-50(A) (2) (b); 40 CFR 268.50(a) (2) (ii)]		
3.	Are land disposal restricted wastes being stored at the facility for greater than one year? If so,	N	
	(a) Has the owner/operator demonstrated that such storage is being conducted solely for the purpose of accumulating sufficient quantities of wastes necessary to facilitate proper recovery, treatment or disposal? [O.A.C. Rule 3745-59-50(A) (1); 40 CFR 268.50(a) (1)]	N/A	

NOTE: A TSD facility may store Land Disposal Restricted wastes on-site for the purpose of accumulating a sufficient amount of waste for proper recovery, treatment or disposal. [O.A.C. Rule 3745-59-50(B); 40 CFR 268.50(b)] During the first year of storage, the burden of proof is on Ohio EPA to demonstrate that such storage is not necessary by the facility. Following one year, the burden of proof shifts to the storage facility to demonstrate that such storage of LDR wastes is necessary to facilitate proper recovery, treatment or disposal.

The requirements of O.A.C. Rule 3745-59-50(C) (40 CFR 268.50(c)) found in Question #3 do not apply to those facilities that store hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm. Please go to Question #4 for applicable requirements.

Y/N/NA RMK#

4. Does the owner/operator store liquid hazardous wastes which also contain PCBs at concentrations greater than or equal to 50 ppm for greater than 90 days? If so,

N _____

(a) Does the facility meet the requirements of 40 CFR 761.65(b)? [O.A.C. Rule 3745-59-50(F); 40 CFR 268.50(f)]

N/A _____

(b) Does the facility remove from storage and treat or dispose of such PCB hazardous wastes within one year from the date that the wastes were initially placed in storage? [O.A.C. Rule 3745-59-50(F); 40 CFR 268.50(f)]

N/A _____

REMARKS

**RCRA HAZARDOUS WASTE FACILITY
COMPLIANCE EVALUATION INSPECTION CHECKLIST**

Facility: Columbus Coated Fabrics
USEPA I.D.: OH0004294351 HWFB No.: 01-25-0145
Street: 1280 North Grant Avenue
City: Columbus State: Ohio Zip: 43201
County: Franklin Telephone: (614) 297-6097
PUCO No.: _____

Owner/Operator: Borden, Inc.
Street: 180 East Broad Street
City: Columbus State: OHIO Zip: 43215
Telephone: (614) 225-4000

Inspection Date: 11/19/91 Time: 8:00 am
through 11/22/91
Advance notice of inspection given? (yes) ☒ (no) _____
If so, how far in advance? three weeks

	<u>Name</u>	<u>Agency/Title</u>	<u>Phone</u>
Inspectors:	<u>Andrew D. Kubalak</u>	<u>District Representative</u> <u>Ohio EPA</u>	<u>(614) 771-7505</u>
Facility Representative:	<u>Grover Thomas</u>	<u>Environmental Manager</u>	<u>(614) 297-6097</u>
	<u>John Sykes</u>	<u>Environmental Coordinator</u>	<u>(614) 297-6097</u>

STATUS

Cond. Ex. SQG _____ SQG _____ Large Quantity Generator ☒
Treatment _____ Storage ☒ Disposal _____ Transporter _____
Part A Permit: (yes) ☒ (no) _____ Part B Permit: (yes) ☒ (no) ☒
LDR Checklist Attached: (yes) ☒ (no) _____

ACTIVITIES

Containers <input checked="" type="checkbox"/>	Used oil burner _____
Tanks _____	Hazardous waste fuel burner/blender _____
Wastepile _____	Incineration/Thermal treatment _____
Landfill _____	Land treatment _____
Surface Impoundment _____	Groundwater monitoring _____

REMARKS - GENERAL INFORMATION

Include list of wastes being managed at the site and a brief description of site activity and waste handling procedures:

This information has been outlined on page two of the RCRA Hazardous Waste Generator Compliance Evaluation Inspection Checklist.

PERMIT STATUS

Y/N/NA RMK#

1. Has the facility submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40?

Y

When was the facility's Part A submitted:

2. Is the facility operating in compliance with the terms conditions of its HWFB permit?

Y

If not, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51?

N/A

If yes, what date was the PCR submitted? _____

3. Has the facility submitted a Part B?

Y

*

REMARKS - PERMIT STATUS

CCF submitted a Part B Permit Application to Ohio EPA, however, on May 23, 1991 CCF withdrew the Part B and informed Ohio EPA and U.S. EPA that they intend to cease handling hazardous waste in a manner which requires a hazardous waste facility permit.

OAC 3745-65-et seq. GENERAL FACILITY STANDARDS

IDENTIFICATION NUMBER (OAC 3745-65-11)

Y/N/RA RMK #

1. Has the facility owner/operator notified U.S. EPA of hazardous waste activity and obtained a U.S. EPA identification number [OAC 3745-65-11]?

Y _____

ANNUAL REPORT REQUIREMENT (OAC 3745-65-75)

2. Has the owner/operator submitted an annual Treatment-Storage-Disposal Operating Report to the Director of the Ohio EPA by March 1st of each calendar year? [3745-65-75]

Y _____

WASTE ANALYSIS/WASTE ANALYSIS PLAN (OAC 3745-65-13)

3. Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat, store or dispose of the waste as required by 3745-65-13(A)(1)?

Y _____

4. Is the waste analysis repeated when a process or operation generating hazardous waste changes? [3745-65-13(A)(3)(a)]

Y _____

5. For off-site facilities; Is the waste analysis repeated when results of inspections under 3745-65-13(A)(4) reveal hazardous waste received at the facility does not match the waste designated on the accompanying manifest? [3745-65-13(A)(3)(b)]

N/A _____

6. Does o/o have a written waste analysis plan which includes the following information [OAC 3745-65-13(B)(1) through (6)]:

- a. The parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters? [3745-65-13(B)(1)]

Y _____

- b. The test methods to be used? [3745-65-13(B)(2)]

Y _____

- c. The sampling method which will be used, either one of the sampling methods described in Appendix I of 3745-51-20 or an equivalent method as defined in OAC 3745-50-107 [3745-65-13(B)(3)(a)(b)]

Y _____

- d. The frequency with which the initial analysis of the waste will be reviewed/repeated to ensure that the analysis is accurate and up-to-date? [3745-65-13(B)(4)]

Y _____

e. FOR OFF-SITE FACILITIES: The waste analysis that hazardous waste generators have agreed to supply? [3745-65-13(B)(5)]

N/A _____

f. FOR OFF-SITE FACILITIES: The sampling methods and procedures which will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identification of the waste on the manifest [3745-65-13(C)]?

N/A _____

g. FOR FACILITIES OPERATING SURFACE IMPOUNDMENTS EXEMPT FROM LAND DISPOSAL RESTRICTIONS UNDER 3745-59-04(A):

N/A _____

Does the waste analysis plan include procedures and schedules for:

i. The sampling of impoundment contents? [3745-65-13(B)(7)]

N/A _____

ii. The analysis of test data? [3745-65-13(B)(7)]

N/A _____

iii. The annual removal of residues which are not delisted or which exhibit the characteristic of a hazardous waste and either do not meet treatment standards (3745-59-44) or where no treatment standards have been established? [3745-65-13-(7)]

N/A _____

h. Where applicable: The methods which will be used to meet the additional waste analysis requirements of rules 3745-59-07, 3745-67-25, 3745-67-52, 3745-67-73, 3745-68-14, 3745-68-41, 3745-68-75 and 3745-69-02 of the OAC? [3745-65-13(B)(6)]

Y _____

REMARKS - WASTE ANALYSIS REQUIREMENTS

OPERATING RECORD REQUIREMENTS (OAC 3745-65-73)

Y/N/NA RMK #

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) which contains the following information:
 - a. ✓Description and ✓quantity of each hazardous waste treated, stored or disposed of within the facility and the ✓date and ✓method pertinent to such treatment, storage or disposal? [3745-65-73(B)(1)] Y _____
 - b. Common name, ✓EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste? Y _____
 - c. The estimated (or actual) weight, volume or density of the waste material? Y _____
 - d. A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745? Y _____
 - e. The present physical location of each hazardous waste within the facility and cross references to specific manifest document numbers? Y _____
 - f. Records of incidents which required implementation of the Contingency Plan? Y _____
 - g. Records of any waste analyses and trial tests required to be performed? Y _____
 - h. Records of the inspections required under the General Inspection Requirements under 3745-65-15? Y _____
 - i. Records of any monitoring, or analytical data required under other Subparts as referenced by 3745-65-73(B)(6)? N/A _____
 - j. FOR DISPOSAL FACILITIES, location and quantity of each hazardous waste recorded on a facility map and cross-references to manifest document numbers? [3745-65-73(B)(2)] N/A _____
 - k. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required by OAC 3745-66? Y _____

NOTE: THE FOLLOWING RECORDKEEPING REQUIREMENTS ARE APPLICABLE ONLY TO OFF-SITE TSDS.

Y/N/NA RMK #

2. Are manifests received by the facility signed and dated?
[3745-65-71(A)(1)]
3. Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)]
 - a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)]?
 - b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) noted in writing on the manifest document?
4. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) or has the o/o submitted the required information to the Director?
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) been submitted to the Director within 15 days?

Y/N/NA	RMK #
N/A	

REMARKS - OPERATING RECORD REQUIREMENTS

GENERAL INSPECTION REQUIREMENTS (OAC 3745-65-15)

Y/N/NA RMK #

1. Does the o/o inspect the facility on a weekly basis for malfunctions, deterioration, operator errors and discharges which may cause a release of hazardous waste or hazardous waste constituents or may pose a threat to human health? [3745-65-15(A)(1)(2)] If so, Y
- a. Are the inspections recorded in an inspection log or summary as required by 3745-65-15(D)? [3745-65-15(A)] Y
 - b. Do records contain date and time of inspection, name of inspector, notation of observations made and date and nature of any repairs or remedial actions as required by 3745-65-15(D)? [3745-65-15(A)] Y
 - c. Are inspection records maintained at the facility for at least (3) years as required by 3745-65-15(D)? [3745-65-15(A)] Y *
2. Has the owner/operator developed a written inspection schedule for inspecting; monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment (e.g. dikes, sumps)? [3745-65-15(B)] If so, Y
- a. Is the schedule kept at the facility? [3745-65-15(B)(2)] Y
 - b. Does the schedule identify the types of problems which are to be looked for during the inspection? [3745-65-15(B)(3)] Y
 - c. Does the schedule include inspection of areas subject to spills (i.e. loading and unloading areas) daily when in use and according to other applicable regulations when not in use? [3745-65-16(B)(4)] Y

REMARKS - GENERAL INSPECTION REQUIREMENTS

* Borden policy is to maintain records for 30 years.

PERSONNEL TRAINING (OAC 3745-65-16)

Y/N/NA RMK #

1. Does the facility provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency procedures, and implementation of the contingency plan? Y
2. Does the facility provide Personnel Training to new employees within 6 months after the date of their employment as required by 3745-65-16(B)? Y
3. Does the facility provide an annual training program refresher course as required by 3745-65-16(B)? Y *
4. Does the facility keep all of the records required by 3745-65-16(D)(E) including written job titles, job descriptions and documented employee training records? Y

REMARKS - PERSONNEL TRAINING

* The Federal Part B Permit requires personnel training twice per year.

1. Does the o/o have a written Contingency Plan which contains the following? [3745-65-52(A)(B)(C)(D)(E)]:
 - a. Actions to be taken by personnel in the event of an emergency incident? Y _____
 - b. Arrangements or agreements with local or state emergency authorities? Y _____
 - c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator? Y _____
 - d. A list of all emergency equipment including location, physical description and outline of capabilities? Y _____
 - e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)]? Y _____
2. Is the Contingency Plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste or hazardous waste constituents to air, soil or surface water? [3745-65-51(A)] Y _____
3. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in execution of the plan? [3745-65-53(A)(B)] Y _____
4. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] Y _____
5. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-55] Y _____

The contingency plan is currently being revised and will be ready for use in December, 1991.

6. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications necessary under 3745-65-56(A-J)?

N/A _____

REMARKS - CONTINGENCY PLAN REQUIREMENTS

PREPAREDNESS AND PREVENTION (OAC 3745-65-30 TO 3745-65-37)

Y/N/NA RMK #

1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] Y _____
2. Has there been a fire, explosion or non-planned release of waste at the facility since date of last inspection? N _____
 - a. If yes, was the contingency plan implemented? [3745-65-51(B)] N/A _____
3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)]
 - a. Internal alarm system? Y _____
 - b. Access to telephone, radio or other device for summoning emergency assistance? Y _____
 - c. Portable fire control equipment, spill control and decontamination equipment? Y _____
 - d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers? Y _____
4. Is all required spill control and decontamination equipment, fire and communications equipment tested on a weekly basis and maintained as necessary? [3745-65-33]
 - a. Does the facility keep an equipment testing log required by 3745-65-33(B), including date and time of test, observations made, and date and nature of any repairs? Y _____
5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device? [3745-65-34] Y _____
6. If required due to the actual hazards associated with the waste, is adequate aisle space maintained to allow unobstructed movement of emergency or spill control equipment? [3745-65-35] Y _____
7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with possible hazards and facility layout? [3745-65-37(A)] Y _____

Y/N/NA RMK #

8. Where state and local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented?
[OAC 3745-65-37(B)]

N/A _____

REMARKS - PREPAREDNESS AND PREVENTION REQUIREMENTS

SECURITY REQUIREMENTS (OAC 3745-65-14)

Y/N/NA RMK #

1. a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)] Y _____
- b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] Y _____

IF BOTH 1A AND 1B ARE NO, MARK QUESTIONS 2 AND 3 NOT APPLICABLE.

2. Does the facility have -
 - a. A 24-hour surveillance system, or; Y _____
 - b. An artificial or natural barrier and a means to control entry at all times? [3745-65-14(B)(2)(a)(b)] Y _____
3. Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary? [3745-65-14(C)] Y _____

REMARKS - SECURITY REQUIREMENTS

The facility indicated that it is unlikely that unknowing/unauthorized persons or livestock entering the facility would become injured, or cause a violation of the hazardous waste regulations.

SPECIAL REQUIREMENTS FOR IGNITABLE/REACTIVE/INCOMPATIBLE
WASTES (OAC 3745-65-17)

Y/N/NA RMK #

1. If ignitable, reactive or incompatible wastes are handled,
does the facility meet the following requirements?
[3745-65-17]

a. Wastes are protected from sources of ignition and/or
reaction?

Y _____

b. Physical separation of incompatible waste materials?

N/A _____

c. "No Smoking" or "No Open Flames" signs are placed
near areas where ignitable or reactive wastes are
handled?

Y _____

d. Commingling of waste materials is done in a controlled,
safe manner as prescribed by 3745-65-17(B)?

N/A _____

REMARKS - IGNITABLE/REACTIVE/INCOMPATIBLE WASTE REQUIREMENTS

SPECIAL REQUIREMENTS
IGNITABLE/REACTIVE/INCOMPATIBLE WASTES

OAC 3745-66 CLOSURE AND POST CLOSURE

Y/N/NA RMK #
See Closure/F
Closure
* Page 2

1. Is a written closure plan on file at the facility which contains the following elements: [3745-66-12]?
 - a. A description of how each hazardous waste management unit will be closed in accordance with 3745-66-11?
 - b. A description of how final closure will meet the requirements of 3745-66-11?
 - c. An estimate of the maximum amount of hazardous waste ever in inventory?
 - d. A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues?
 - e. The year closure is expected to begin and a schedule for the various phases of closure?
 - f. A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control?
2. Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)]
3. Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director 180 days prior to beginning the closure process? [3745-66-12(D)]
4. Has the closure plan (and post-closure plan, if applicable) for tank, container storage or incinerator units been submitted to the Director 45 days prior to beginning the closure process? [3745-66-12(D)]
5. Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)]
6. Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)]
7. Did the owner/operator submit to the Director, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15]

8. Did the owner/operator submit to the local zoning authority and the Director a survey plat in accordance with OAC 3745-66-16? *
9. What permitted units at the facility have been closed in accordance with an approved Closure Plan?
10. If closure was partial, list the regulated units which remain in use at the facility:
11. If required, has the facility prepared a written post-closure plan? [3745-66-18]
- If so, does the post-closure plan include:
- a. A description of proposed ground water monitoring?
 - b. A description of planned maintenance activities?
 - c. The name, address and phone number of person/office to contact during the post-closure period?
12. For disposal facilities; has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19]
13. Has the owner of the property on which a disposal unit is located recorded on the deed that:
- a. The land has been used to manage hazardous waste and the type, quantity and location of waste?
 - b. Land use is restricted under closure and post-closure rules? [3745-66-19]

REMARKS - CLOSURE/POST CLOSURE REQUIREMENTS

* On June 28, 1991, Columbus Coated Fabrics submitted a closure plan for the hazardous waste container storage area. Review of this closure plan is now pending at the Ohio EPA.

Springfield Environmental Inc.

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& Lockwood Laboratories TCLP LABORATORY ANALYSIS RESULTS

ATTN JOHN H SYKES
COLUMBUS COATED FABRICS
P O BOX 208
COLUMBUS OH 43201

Report Date: 10/22/91

(1)

SAMPLE ID: MURIATIC RAGS # 698 LOG #: 5535-150
METALS ANALYST: Karen Anderson METALS ANALYZED: 10/18/91
ORGANICS ANALYST: Mike Schmidt ORGANICS ANALYZED: 10/21/91
METHODOLOGY: Volatiles by 8240, Semi-volatiles by 8270.

ANALYSIS

EPA HW NUMBER	CONTAMINANT	REGULATORY LEVEL(mg/l)	RESULTS(mg/l)
D004	Arsenic	5.0	< 0.002
D005	Barium	100.0	0.500
D018	Benzene	0.5	< 0.050
D006	Cadmium	1.0	0.084
D019	Carbon Tetrachloride	0.5	< 0.050
D021	Chlorobenzene	100.0	< 0.050
D022	Chloroform	6.0	< 0.050
D007	Chromium	5.0	521.9
D023	o-Cresol	200.0	< 0.200
D024	m-Cresol	200.0	< 0.200
D025	p-Cresol	200.0	< 0.200
D026	Cresol	200.0	< 0.200
D027	1,4-Dichlorobenzene	7.5	< 0.050
D028	1,2-Dichloroethane	0.5	< 0.050
D029	1,1-Dichloroethylene	0.7	< 0.050
D030	2,4-Dinitrotoluene	0.13	< 0.050
D032	Hexachlorobenzene	0.13	< 0.050
D033	Hexachlorobutadiene	0.5	< 0.050
D034	Hexachloroethane	3.0	< 0.050
D008	Lead	5.0	0.313
D009	Mercury	0.2	< 0.002
D035	Methyl ethyl ketone	200.0	< 0.100
D036	Nitrobenzene	2.0	< 0.050
D037	Pentachlorophenol	100.0	< 0.050
D038	Pyridine	5.0	< 0.050
D010	Selenium	1.0	< 0.002
D011	Silver	5.0	0.043
D039	Tetrachloroethylene	0.7	< 0.050
D040	Trichloroethylene	0.5	< 0.050
D041	2,4,5-Trichlorophenol	400.0	< 0.050
D042	2,4,6-Trichlorophenol	2.0	< 0.050
D043	Vinyl chloride	0.2	< 0.100

providing quality analytical and environmental services

Springfield Environmental Inc.

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Lockwood Laboratories*

LABORATORY ANALYSIS RESULTS

ATTN JOHN H SYKES
COLUMBUS COATED FABRICS
1280 N GRANT AVE
COLUMBUS OH 43201

Report Date: 10/22/91

Report Released By:

Ed Lockwood Jr.
Ed Lockwood Jr., Pres.
P.O. Box 2728
1001 East St.
Springfield, OH 45501
513-324-8001

SAMPLE ID: Muriatic Acid Soaked Rags #698
SAMPLER: John Sykes
COUNTY: Franklin
SAMPLE TYPE: Grab
SAMPLE COLLECTED: 9:30 a.m. 10/16/91
SAMPLE RECEIVED: 10/16/91

ANALYSIS

LABORATORY LOG No: 5535-150

Component (Units)	Result	Method	Analyst	Date
Paint Filter				
Free Liquid	PASS	SW846 9095	TV	10/17/91
Ignitability				
Flashpoint (F)	>200	SW846 1010	TV	10/18/91
Corrosivity				
pH (S.U.)	< 2.0	SW846 9045	TV	10/17/91
Reactivity				
Sulfide (mg/kg)	< 1.0	SW846 9030	ST	10/18/91
Cyanide (mg/kg)	< 1.0	SW846 9010	BE	10/18/91
Copper, TCLP (mg/l)	4.82	1311/7210	KA	10/18/91
Zinc, TCLP (mg/l)	107.80	1311/7950	KA	10/18/91

TCLP Methodology: TCLP extraction by SW846 1311. Volatiles by SW846 8240. Semi-volatiles by SW846 8270. Metals by AA.

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Springfield Environmental Inc.

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TCLP LABORATORY ANALYSIS RESULTS

ATTN JOHN H SYKES
COLUMBUS COATED FABRICS
P O BOX 208
COLUMBUS OH 43201

Report Date: 10/23/91

(2)

SAMPLE ID: CHROMIC RAGS # 699 LOG #: 5536-150
METALS ANALYST: Karen Anderson METALS ANALYZED: 10/18/91
ORGANICS ANALYST: Mike Schmidt ORGANICS ANALYZED: 10/22/91
METHODOLOGY: Volatiles by 8240, Semi-volatiles by 8270.

ANALYSIS

EPA HW NUMBER	CONTAMINANT	REGULATORY LEVEL(mg/l)	RESULTS(mg/l)
D004	Arsenic	5.0	< 0.002
D005	Barium	100.0	< 0.200
D018	Benzene	0.5	< 0.050
D006	Cadmium	1.0	0.085
D019	Carbon Tetrachloride	0.5	< 0.050
D021	Chlorobenzene	100.0	< 0.050
D022	Chloroform	6.0	< 0.050
D007	Chromium	5.0	2615.0
D023	o-Cresol	200.0	< 0.200
D024	m-Cresol	200.0	< 0.200
D025	p-Cresol	200.0	< 0.200
D026	Cresol	200.0	< 0.200
D027	1,4-Dichlorobenzene	7.5	< 0.050
D028	1,2-Dichloroethane	0.5	< 0.050
D029	1,1-Dichloroethylene	0.7	< 0.050
D030	2,4-Dinitrotoluene	0.13	< 0.050
D032	Hexachlorobenzene	0.13	< 0.050
D033	Hexachlorobutadiene	0.5	< 0.050
D034	Hexachloroethane	3.0	< 0.050
D008	Lead	5.0	< 0.100
D009	Mercury	0.2	< 0.002
D035	Methyl ethyl ketone	200.0	< 0.100
D036	Nitrobenzene	2.0	< 0.050
D037	Pentachlorophenol	100.0	< 0.050
D038	Pyridine	5.0	< 0.050
D010	Selenium	1.0	< 0.002
D011	Silver	5.0	0.059
D039	Tetrachloroethylene	0.7	< 0.050
D040	Trichloroethylene	0.5	< 0.050
D041	2,4,5-Trichlorophenol	400.0	< 0.050
D042	2,4,6-Trichlorophenol	2.0	< 0.050
D043	Vinyl chloride	0.2	< 0.100

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Springfield Environmental Inc.

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LABORATORY ANALYSIS RESULTS

ATTN JOHN H SYKES
COLUMBUS COATED FABRICS
1280 N GRANT AVE
COLUMBUS OH 43201

Report Date: 10/23/91

Report Released By:

Ed Lockwood Jr.
Ed Lockwood Jr., Pres.
P.O. Box 2728
1001 East St.
Springfield, OH 45501
513-324-8001

SAMPLE ID: Chromic Acid Soaked Rags # 699
SAMPLER: John Sykes
COUNTY: Franklin
SAMPLE TYPE: Grab
SAMPLE COLLECTED: 9:30 a.m. 10/16/91
SAMPLE RECEIVED: 10/16/91

ANALYSIS

LABORATORY LOG No: 5536-150

Component (Units)	Result	Method	Analyst	Date
Paint Filter				
Free Liquid	PASS	SW846 9095	TV	10/17/91
Ignitability				
Flashpoint (F)	>200	SW846 1010	ST	10/18/91
Corrosivity				
pH (S.U.)	5.8	SW846 9045	TV	10/17/91
Reactivity				
Sulfide (mg/kg)	< 1.0	SW846 9030	ST	10/18/91
Cyanide (mg/kg)	< 1.0	SW846 9010	BE	10/18/91
Copper, TCLP (mg/l)	306.0	1311/7210	KA	10/18/91
Zinc, TCLP (mg/l)	10.8	1311/7950	KA	10/18/91

TCLP Methodology: TCLP extraction by SW846 1311. Volatiles by SW846 8240. Semi-volatiles by SW846 8270. Metals by AA.

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Springfield Environmental Inc.

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TCLP LABORATORY ANALYSIS RESULTS

ATTN: JOHN H. SYKES
COLUMBUS COATED FABRICS
P O BOX 208
COLUMBUS OH 43201

Report Date: 10/24/91

(7)

SAMPLE ID: PR-100 STRIP # 700 LOG #: 5537-150
METALS ANALYST: Karen Anderson METALS ANALYZED: 10/18/91
ORGANICS ANALYST: Mike Schmidt ORGANICS ANALYZED: 10/23/91
METHODOLOGY: Volatiles by 8240, Semi-volatiles by 8270.

ANALYSIS

EPA HW NUMBER	CONTAMINANT	REGULATORY LEVEL(mg/l)	RESULTS(mg/l)
D004	Arsenic	5.0	< 0.002
D005	Barium	100.0	< 0.200
D018	Benzene	0.5	< 0.050
D006	Cadmium	1.0	0.178
D019	Carbon Tetrachloride	0.5	< 0.050
D021	Chlorobenzene	100.0	< 0.050
D022	Chloroform	6.0	< 0.050
D007	Chromium	5.0	4.966
D023	o-Cresol	200.0	< 0.200
D024	m-Cresol	200.0	< 0.200
D025	p-Cresol	200.0	< 0.200
D026	Cresol	200.0	< 0.200
D027	1,4-Dichlorobenzene	7.5	< 0.050
D028	1,2-Dichloroethane	0.5	< 0.050
D029	1,1-Dichloroethylene	0.7	< 0.050
D030	2,4-Dinitrotoluene	0.13	< 0.050
D032	Hexachlorobenzene	0.13	< 0.050
D033	Hexachlorobutadiene	0.5	< 0.050
D034	Hexachloroethane	3.0	< 0.050
D008	Lead	5.0	2.320
D009	Mercury	0.2	< 0.002
D035	Methyl ethyl ketone	200.0	< 0.100
D036	Nitrobenzene	2.0	< 0.050
D037	Pentachlorophenol	100.0	< 0.050
D038	Pyridine	5.0	< 0.050
D010	Selenium	1.0	< 0.002
D011	Silver	5.0	0.022
D039	Tetrachloroethylene	0.7	< 0.050
D040	Trichloroethylene	0.5	< 0.050
D041	2,4,5-Trichlorophenol	400.0	< 0.050
D042	2,4,6-Trichlorophenol	2.0	< 0.050
D043	Vinyl chloride	0.2	< 0.100

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Springfield Environmental Inc.

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LABORATORY ANALYSIS RESULTS

ATTN JOHN H SYKES
COLUMBUS COATED FABRICS
1280 N GRANT AVE
COLUMBUS OH 43201

Report Date: 10/24/91

Report Released By:

Ed Lockwood Jr.
Ed Lockwood Jr., Pres.
P.O. Box 2728
1001 East St.
Springfield, OH 45501
513-324-8001

SAMPLE ID: PR-100 STRIP #700
SAMPLER: John Sykes
COUNTY: Franklin
SAMPLE TYPE: Grab
SAMPLE COLLECTED: 9:30 a.m. 10/16/91
SAMPLE RECEIVED: 10/16/91

ANALYSIS

LABORATORY LOG No: 5537-150

Component (Units)	Result	Method	Analyst	Date
Paint Filter				
Free Liquid	FAIL	SW846 9095	TV	10/17/91
Ignitability				
Flashpoint (F)	>200	SW846 1010	ST	10/18/91
Corrosivity				
pH (S.U.)	7.8	SW846 9045	TV	10/17/91
Reactivity				
Sulfide (mg/l)	< 1.0	SW846 9030	ST	10/18/91
Cyanide (mg/l)	< 0.020	SW846 9010	BE	10/18/91
Copper, TCLP (mg/l)	171.0	1311/7210	KA	10/18/91
Zinc, TCLP (mg/l)	53.0	1311/7950	KA	10/18/91

TCLP Methodology: TCLP extraction by SW846 1311. Volatiles by SW846 8240. Semi-volatiles by SW846 8270. Metals by AA.

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LABORATORY ANALYSIS RESULTS

ATTN JOHN H SYKES
COLUMBUS COATED FABRICS
1280 N GRANT AVE
COLUMBUS OH 43201

Report Date: 11/15/91

Report Released By:

Ed Lockwood Jr.
Ed Lockwood Jr., Pres.
P.O. Box 2728
1001 East St.
Springfield, OH 45501
513-324-8001

8

SAMPLE ID: #726 Dust Stop Oil
SAMPLER: John Sykes
COUNTY: Franklin
SAMPLE TYPE: Grab
SAMPLE COLLECTED: 12:30pm on 11/5/91
SAMPLE RECEIVED: 11/5/91

ANALYSIS

LABORATORY LOG No: 5940-150

Component (Units)	Result	Method	Analyst	Date
Paint Filter				
Free Liquid	PASS	SW846 9095	TV	11/7/91
Ignitability				
Flashpoint (F)	> 200	SW846 1010	KA	11/8/91
Corrosivity				
pH (S.U.)	5.3	SW846 9045	ST	11/5/91
Reactivity				
Sulfide (mg/kg)	< 5.0	SW846 9030	ST	11/6/91
Cyanide (mg/kg)	< 1.0	SW846 9010	BE	11/6/91
Copper, TCLP (mg/l)	< 0.020	1311/7210	KA	11/8/91
Zinc, TCLP (mg/l)	8.520	1311/7950	KA	11/8/91
BTU	BTU/lb.	17,704	SR	11/14/91
% Solids (%)		30.0	ST	11/14/91

TCLP Methodology: TCLP extraction by SW846 1311. Volatiles by SW846 8240. Semi-volatiles by SW846 8270. Metals by AA.

TCLP LABORATORY ANALYSIS RESULTS

ATTN JOHN H SYKES
COLUMBUS COATED FABRICS
P O BOX 208
COLUMBUS OH 43201

Report Date: 11/14/91

SAMPLE ID: Dust Stop Oil Filters # 727 LOG #: 5941-150
METALS ANALYST: Karen Anderson METALS ANALYZED: 11/8/91
ORGANICS ANALYST: Mike Schmidt ORGANICS ANALYZED: 11/13/91
METHODOLOGY: Volatiles by 8240, Semi-volatiles by 8270.

ANALYSIS

EPA HW NUMBER	CONTAMINANT	REGULATORY LEVEL(mg/l)	RESULTS(mg/l)
D004	Arsenic	5.0	< 0.002
D005	Barium	100.0	34.0
D018	Benzene	0.5	< 0.050
D006	Cadmium	1.0	40.2
D019	Carbon Tetrachloride	0.5	< 0.050
D021	Chlorobenzene	100.0	< 0.050
D022	Chloroform	6.0	< 0.050
D007	Chromium	5.0	< 0.050
D023	o-Cresol	200.0	< 0.200
D024	m-Cresol	200.0	< 0.200
D025	p-Cresol	200.0	< 0.200
D026	Cresol	200.0	< 0.200
D027	1,4-Dichlorobenzene	7.5	< 0.050
D028	1,2-Dichloroethane	0.5	< 0.050
D029	1,1-Dichloroethylene	0.7	< 0.050
D030	2,4-Dinitrotoluene	0.13	< 0.050
D032	Hexachlorobenzene	0.13	< 0.050
D033	Hexachlorobutadiene	0.5	< 0.050
D034	Hexachloroethane	3.0	< 0.050
D008	Lead	5.0	< 0.100
D009	Mercury	0.2	< 0.002
D035	Methyl ethyl ketone	200.0	< 0.100
D036	Nitrobenzene	2.0	< 0.050
D037	Pentachlorophenol	100.0	< 0.050
D038	Pyridine	5.0	< 0.050
D010	Selenium	1.0	< 0.002
D011	Silver	5.0	< 0.010
D039	Tetrachloroethylene	0.7	< 0.050
D040	Trichloroethylene	0.5	< 0.050
D041	2,4,5-Trichlorophenol	400.0	< 0.050
D042	2,4,6-Trichlorophenol	2.0	< 0.050
D043	Vinyl chloride	0.2	< 0.100

Springfield Environmental Inc.

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Lockwood Laboratories

LABORATORY ANALYSIS RESULTS

ATTN JOHN H SYKES
COLUMBUS COATED FABRICS
1280 N GRANT AVE
COLUMBUS OH 43201

Report Date: 11/9/91

Report Released By:

Ed Lockwood Jr.

Ed Lockwood Jr., Pres.
P.O. Box 2728
1001 East St.
Springfield, OH 45501
513-324-8001

(3)

SAMPLE ID: #723 Pan Wash Liquid - Solvent Based
SAMPLER: John Sykes
COUNTY: Franklin
SAMPLE TYPE: Grab
SAMPLE COLLECTED: 2:00pm 10/31/91
SAMPLE RECEIVED: 11/1/91

ANALYSIS

LABORATORY LOG No: 5839-150

Component (Units)	Result	Method	Analyst	Date
Paint Filter				
Free Liquid	FAIL	SW846 9095	TV	11/4/91
Ignitability				
Flashpoint (F)	78	SW846 1010	KA	11/9/91
Corrosivity				
pH (S.U.)	5.5	SW846 9045	ST	11/1/91
Reactivity				
Sulfide (mg/l)	< 1.0	SW846 9030	ST	11/6/91
Cyanide (mg/l)	< 0.020	SW846 9010	BE	11/6/91
Copper, TCLP (mg/l)	0.078	1311/7210	KA	11/4/91
Zinc, TCLP (mg/l)	0.244	1311/7950	KA	11/4/91
BTU BTU/lb.	13,586		SR	11/5/91
% Solids (%)	14.2		ST	11/7/91

TCLP Methodology: TCLP extraction by SW846 1311. Volatiles by SW846 8240. Semi-volatiles by SW846 8270. Metals by AA.

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Springfield Environmental Inc.

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Lockwood Laboratories
TCLP LABORATORY ANALYSIS RESULTS

ATTN JOHN H SYKES
COLUMBUS COATED FABRICS
P O BOX 208
COLUMBUS OH 43201

Report Date: 11/12/91

SAMPLE ID: Pan Wash Liquid # 723 LOG #: 5839-150
METALS ANALYST: Karen Anderson METALS ANALYZED: 11/4/91
ORGANICS ANALYST: Mike Schmidt ORGANICS ANALYZED: 11/12/91
METHODOLOGY: Volatiles by 8241, Semi-volatiles by 8270.

ANALYSIS

EPA HW NUMBER	CONTAMINANT	REGULATORY LEVEL(mg/l)	RESULTS(mg/l)
D004	Arsenic	5.0	< 0.002
D005	Barium	100.0	< 0.200
D018	Benzene	0.5	< 0.050
D006	Cadmium	1.0	0.160
D019	Carbon Tetrachloride	0.5	< 0.050
D021	Chlorobenzene	100.0	< 0.050
D022	Chloroform	6.0	< 0.050
D007	Chromium	5.0	< 0.050
D023	o-Cresol	200.0	< 0.200
D024	m-Cresol	200.0	< 0.200
D025	p-Cresol	200.0	< 0.200
D026	Cresol	200.0	< 0.200
D027	1,4-Dichlorobenzene	7.5	< 0.050
D028	1,2-Dichloroethane	0.5	< 0.050
D029	1,1-Dichloroethylene	0.7	< 0.050
D030	2,4-Dinitrotoluene	0.13	< 0.050
D032	Hexachlorobenzene	0.13	< 0.050
D033	Hexachlorobutadiene	0.5	< 0.050
D034	Hexachloroethane	3.0	< 0.050
D008	Lead	5.0	2.734
D009	Mercury	0.2	< 0.002
D035	Methyl ethyl ketone	200.0	< 0.100
D036	Nitrobenzene	2.0	< 0.050
D037	Pentachlorophenol	100.0	< 0.050
D038	Pyridine	5.0	< 0.050
D010	Selenium	1.0	< 0.002
D011	Silver	5.0	< 0.010
D039	Tetrachloroethylene	0.7	0.125
D040	Trichloroethylene	0.5	< 0.050
D041	2,4,5-Trichlorophenol	400.0	< 0.050
D042	2,4,6-Trichlorophenol	2.0	< 0.050
D043	Vinyl chloride	0.2	< 0.100

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Springfield Environmental Inc.

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& Lockwood Laboratories

TCLP LABORATORY ANALYSIS RESULTS

ATTN JOHN H SYKES
COLUMBUS COATED FABRICS
1280 N GRANT AVE
COLUMBUS OH 43201

Report Date: 11/6/91

4

SAMPLE ID: #722 Pan Wash Solids LOG #: 5838-150
METALS ANALYST: Karen Anderson METALS ANALYZED: 11/4/91
ORGANICS ANALYST: Mike Schmidt ORGANICS ANALYZED: 11/6/91
METHODOLOGY: Volatiles by 8240, Semi-volatiles by 8270.

ANALYSIS

EPA HW NUMBER	CONTAMINANT	REGULATORY LEVEL(mg/l)	RESULTS(mg/l)
D004	Arsenic	5.0	< 0.002
D005	Barium	100.0	1.050
D018	Benzene	0.5	< 0.050
D006	Cadmium	1.0	0.240
D019	Carbon Tetrachloride	0.5	< 0.050
D021	Chlorobenzene	100.0	< 0.050
D022	Chloroform	6.0	< 0.050
D007	Chromium	5.0	0.547
D023	o-Cresol	200.0	< 0.200
D024	m-Cresol	200.0	< 0.200
D025	p-Cresol	200.0	< 0.200
D026	Cresol	200.0	< 0.200
D027	1,4-Dichlorobenzene	7.5	< 0.050
D028	1,2-Dichloroethane	0.5	< 0.050
D029	1,1-Dichloroethylene	0.7	< 0.050
D030	2,4-Dinitrotoluene	0.13	< 0.050
D032	Hexachlorobenzene	0.13	< 0.050
D033	Hexachlorobutadiene	0.5	< 0.050
D034	Hexachloroethane	3.0	< 0.050
D008	Lead	5.0	15.86
D009	Mercury	0.2	< 0.002
D035	Methyl ethyl ketone	200.0	< 0.100
D036	Nitrobenzene	2.0	< 0.050
D037	Pentachlorophenol	100.0	< 0.050
D038	Pyridine	5.0	< 0.050
D010	Selenium	1.0	< 0.002
D011	Silver	5.0	< 0.010
D039	Tetrachloroethylene	0.7	< 0.050
D040	Trichloroethylene	0.5	< 0.050
D041	2,4,5-Trichlorophenol	400.0	< 0.050
D042	2,4,6-Trichlorophenol	2.0	< 0.050
D043	Vinyl chloride	0.2	< 0.100

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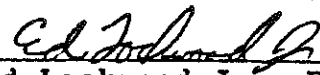
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LABORATORY ANALYSIS RESULTS

 ATTN JOHN H SYKES
 COLUMBUS COATED FABRICS
 1280 N GRANT AVE
 COLUMBUS OH 43201

Report Date: 11/6/91

Report Released By:


 Ed Lockwood Jr., Pres.
 P.O. Box 2728
 1001 East St.
 Springfield, OH 45501
 513-324-8001

SAMPLE ID:	#722	Pan Wash Solids - Waterbased
SAMPLER:		John Sykes
COUNTY:		Franklin
SAMPLE TYPE:		Grab
SAMPLE COLLECTED:	2:00pm	10/31/91
SAMPLE RECEIVED:	11/1/91	

ANALYSIS

LABORATORY LOG No: 5838-150

<u>Component</u>	<u>(Units)</u>	<u>Result</u>	<u>Method</u>	<u>Analyst</u>	<u>Date</u>
Paint Filter					
Free Liquid		PASS	SW846 9095	TV	11/4/91
Ignitability					
Flashpoint (F)		>200	SW846 1010	EL	11/1/91
Corrosivity					
pH (S.U.)		5.3	SW846 9045	ST	11/1/91
Reactivity					
Sulfide (mg/kg)		< 5.0	SW846 9030	ST	11/6/91
Cyanide (mg/kg)		< 1.0	SW846 9010	BE	11/6/91
Copper, TCLP (mg/l)		0.299	1311/7210	KA	11/4/91
Zinc, TCLP (mg/l)		7.520	1311/7950	KA	11/4/91
BTU	BTU/lb.	4,657		SR	11/5/91

 TCLP Methodology: TCLP extraction by SW846 1311. Volatiles
 by SW846 8240. Semi-volatiles by SW846
 8270. Metals by AA.

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TCLP LABORATORY ANALYSIS RESULTS

ATTN JOHN H SYKES
COLUMBUS COATED FABRICS
P O BOX 208
COLUMBUS OH 43201

Report Date: 11/14/91

SAMPLE ID: Dust Stop Oil Filters # 727 LOG #: 5941-150
METALS ANALYST: Karen Anderson METALS ANALYZED: 11/8/91
ORGANICS ANALYST: Mike Schmidt ORGANICS ANALYZED: 11/13/91
METHODOLOGY: Volatiles by 8240, Semi-volatiles by 8270.

ANALYSIS

EPA HW NUMBER	CONTAMINANT	REGULATORY LEVEL(mg/l)	RESULTS(mg/l)
D004	Arsenic	5.0	< 0.002
D005	Barium	100.0	34.0
D018	Benzene	0.5	< 0.050
D006	Cadmium	1.0	40.2
D019	Carbon Tetrachloride	0.5	< 0.050
D021	Chlorobenzene	100.0	< 0.050
D022	Chloroform	6.0	< 0.050
D007	Chromium	5.0	< 0.050
D023	o-Cresol	200.0	< 0.200
D024	m-Cresol	200.0	< 0.200
D025	p-Cresol	200.0	< 0.200
D026	Cresol	200.0	< 0.200
D027	1,4-Dichlorobenzene	7.5	< 0.050
D028	1,2-Dichloroethane	0.5	< 0.050
D029	1,1-Dichloroethylene	0.7	< 0.050
D030	2,4-Dinitrotoluene	0.13	< 0.050
D032	Hexachlorobenzene	0.13	< 0.050
D033	Hexachlorobutadiene	0.5	< 0.050
D034	Hexachloroethane	3.0	< 0.050
D008	Lead	5.0	< 0.100
D009	Mercury	0.2	< 0.002
D035	Methyl ethyl ketone	200.0	< 0.100
D036	Nitrobenzene	2.0	< 0.050
D037	Pentachlorophenol	100.0	< 0.050
D038	Pyridine	5.0	< 0.050
D010	Selenium	1.0	< 0.002
D011	Silver	5.0	< 0.010
D039	Tetrachloroethylene	0.7	< 0.050
D040	Trichloroethylene	0.5	< 0.050
D041	2,4,5-Trichlorophenol	400.0	< 0.050
D042	2,4,6-Trichlorophenol	2.0	< 0.050
D043	Vinyl chloride	0.2	< 0.100

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TCLP LABORATORY ANALYSIS RESULTS

ATTN JOHN H SYKES
COLUMBUS COATED FABRICS
P O BOX 208
COLUMBUS OH 43201

Report Date: 10/24/91

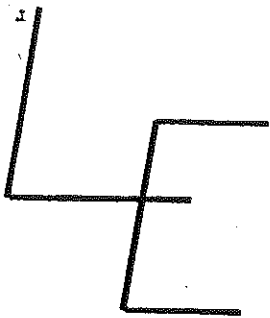
(7)

SAMPLE ID: PR-100 STRIP # 700 LOG #: 5537-150
METALS ANALYST: Karen Anderson METALS ANALYZED: 10/18/91
ORGANICS ANALYST: Mike Schmidt ORGANICS ANALYZED: 10/23/91
METHODOLOGY: Volatiles by 8240, Semi-volatiles by 8270.

ANALYSIS

EPA HW NUMBER	CONTAMINANT	REGULATORY LEVEL(mg/l)	RESULTS(mg/l)
D004	Arsenic	5.0	< 0.002
D005	Barium	100.0	< 0.200
D018	Benzene	0.5	< 0.050
D006	Cadmium	1.0	0.178
D019	Carbon Tetrachloride	0.5	< 0.050
D021	Chlorobenzene	100.0	< 0.050
D022	Chloroform	6.0	4.966
D007	Chromium	5.0	< 0.200
D023	o-Cresol	200.0	< 0.200
D024	m-Cresol	200.0	< 0.200
D025	p-Cresol	200.0	< 0.200
D026	Cresol	200.0	< 0.050
D027	1,4-Dichlorobenzene	7.5	< 0.050
D028	1,2-Dichloroethane	0.5	< 0.050
D029	1,1-Dichloroethylene	0.7	< 0.050
D030	2,4-Dinitrotoluene	0.13	< 0.050
D032	Hexachlorobenzene	0.13	< 0.050
D033	Hexachlorobutadiene	0.5	< 0.050
D034	Hexachloroethane	3.0	2.320
D008	Lead	5.0	< 0.002
D009	Mercury	0.2	< 0.100
D035	Methyl ethyl ketone	200.0	< 0.050
D036	Nitrobenzene	2.0	< 0.050
D037	Pentachlorophenol	100.0	< 0.050
D038	Pyridine	5.0	< 0.002
D010	Selenium	1.0	0.022
D011	Silver	5.0	< 0.050
D039	Tetrachloroethylene	0.7	< 0.050
D040	Trichloroethylene	0.5	< 0.050
D041	2,4,5-Trichlorophenol	400.0	< 0.050
D042	2,4,6-Trichlorophenol	2.0	< 0.100
D043	Vinyl chloride	0.2	

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LABORATORY ANALYSIS RESULTS

ATTN JOHN H SYKES
COLUMBUS COATED FABRICS
1280 N GRANT AVE
COLUMBUS OH 43201

Report Date: 11/15/91

Report Released By:

Ed Lockwood Jr.
Ed Lockwood Jr., Pres.
P.O. Box 2728
1001 East St.
Springfield, OH 45501
513-324-8001

⑧

SAMPLE ID: #726 Dust Stop Oil
SAMPLER: John Sykes
COUNTY: Franklin
SAMPLE TYPE: Grab
SAMPLE COLLECTED: 12:30pm on 11/5/91
SAMPLE RECEIVED: 11/5/91

ANALYSIS

LABORATORY LOG No: 5940-150

Component (Units)	Result	Method	Analyst	Date
Paint Filter				
Free Liquid	PASS	SW846 9095	TV	11/7/91
Ignitability				
Flashpoint (F)	> 200	SW846 1010	KA	11/8/91
Corrosivity				
pH (S.U.)	5.3	SW846 9045	ST	11/5/91
Reactivity				
Sulfide (mg/kg)	< 5.0	SW846 9030	ST	11/6/91
Cyanide (mg/kg)	< 1.0	SW846 9010	BE	11/6/91
Copper, TCLP (mg/l)	< 0.020	1311/7210	KA	11/8/91
Zinc, TCLP (mg/l)	8.520	1311/7950	KA	11/8/91
BTU BTU/lb.	17,704		SR	11/14/91
% Solids (%)	30.0		ST	11/14/91

TCLP Methodology: TCLP extraction by SW846 1311. Volatiles by SW846 8240. Semi-volatiles by SW846 8270. Metals by AA.

TCLP LABORATORY ANALYSIS RESULTS

ATTN JOHN H SYKES
COLUMBUS COATED FABRICS
P O BOX 208
COLUMBUS OH 43201

Report Date: 11/15/91

SAMPLE ID: Dust Stop Oil # 726 LOG #: 5940-150
METALS ANALYST: Karen Anderson METALS ANALYZED: 11/8/91
ORGANICS ANALYST: Mike Schmidt ORGANICS ANALYZED: 11/13/91
METHODOLOGY: Volatiles by 8240, Semi-volatiles by 8270.

ANALYSIS

EPA HW NUMBER	CONTAMINANT	REGULATORY LEVEL(mg/l)	RESULTS(mg/l)
D004	Arsenic	5.0	< 0.002
D005	Barium	100.0	11.23
D018	Benzene	0.5	< 0.050
D006	Cadmium	1.0	0.099
D019	Carbon Tetrachloride	0.5	< 0.050
D021	Chlorobenzene	100.0	< 0.050
D022	Chloroform	6.0	< 0.050
D007	Chromium	5.0	< 0.050
D023	o-Cresol	200.0	< 0.200
D024	m-Cresol	200.0	< 0.200
D025	p-Cresol	200.0	< 0.200
D026	Cresol	200.0	< 0.200
D027	1,4-Dichlorobenzene	7.5	< 0.050
D028	1,2-Dichloroethane	0.5	< 0.050
D029	1,1-Dichloroethylene	0.7	< 0.050
D030	2,4-Dinitrotoluene	0.13	< 0.050
D032	Hexachlorobenzene	0.13	< 0.050
D033	Hexachlorobutadiene	0.5	< 0.050
D034	Hexachloroethane	3.0	< 0.050
D008	Lead	5.0	< 0.100
D009	Mercury	0.2	< 0.002
D035	Methyl ethyl ketone	200.0	< 0.100
D036	Nitrobenzene	2.0	< 0.050
D037	Pentachlorophenol	100.0	< 0.050
D038	Pyridine	5.0	< 0.050
D010	Selenium	1.0	< 0.002
D011	Silver	5.0	< 0.010
D039	Tetrachloroethylene	0.7	< 0.050
D040	Trichloroethylene	0.5	< 0.050
D041	2,4,5-Trichlorophenol	400.0	< 0.050
D042	2,4,6-Trichlorophenol	2.0	< 0.050
D043	Vinyl chloride	0.2	< 0.100

Springfield Environmental Inc.

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LABORATORY ANALYSIS RESULTS

ATTN JOHN H SYKES
COLUMBUS COATED FABRICS
1280 N GRANT AVE
COLUMBUS OH 43201

Report Date: 11/1/91

Report Released By:

Ed Lockwood Jr.
Ed Lockwood Jr., Pres.
P.O. Box 2728
1001 East St.
Springfield, OH 45501
513-324-8001

(9)

SAMPLE ID: #716 Limestone Sump From Electroplating
SAMPLER: John Sykes
COUNTY: Franklin
SAMPLE TYPE: Grab
SAMPLE COLLECTED: 11:00am 10/29/91
SAMPLE RECEIVED: 10/29/91

ANALYSIS

LABORATORY LOG No: 5735-150

Component (Units)	Result	Method	Analyst	Date
Paint Filter				
Free Liquid	PASS	SW846 9095	TV	10/29/91
Ignitability				
Flashpoint (F)	>150	SW846 1010	EL	11/1/91
Corrosivity				
pH (S.U.)	8.5	SW846 9045	ST	10/29/91
Reactivity				
Sulfide (mg/kg)	< 1.0	SW846 9030	ST	11/1/91
Cyanide (mg/kg)	< 1.0	SW846 9010	BE	11/1/91
Copper, TCLP (mg/l)	0.190	1311/7210	KA	11/1/91
Zinc, TCLP (mg/l)	0.127	1311/7950	KA	11/1/91
BTU	BTU/lb.	1,006	SR	11/1/91

TCLP Methodology: TCLP extraction by SW846 1311. Volatiles by SW846 8240. Semi-volatiles by SW846 8270. Metals by AA.

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TCLP LABORATORY ANALYSIS RESULTS

ATTN JOHN H SYKES
COLUMBUS COATED FABRICS
1280 N GRANT AVE
COLUMBUS OH 43201

Report Date: 11/1/91

SAMPLE ID: #716 Limestone Sump

LOG #: 5735-150

METALS ANALYST: Karen Anderson

METALS ANALYZED: 11/1/91

ORGANICS ANALYST: Mike Schmidt

ORGANICS ANALYZED: 11/1/91

METHODOLOGY: Volatiles by 8240, Semi-volatiles by 8270.

ANALYSIS

EPA HW NUMBER	CONTAMINANT	REGULATORY LEVEL(mg/l)	RESULTS(mg/l)
D004	Arsenic	5.0	< 0.002
D005	Barium	100.0	0.210
D018	Benzene	0.5	< 0.050
D006	Cadmium	1.0	< 0.020
D019	Carbon Tetrachloride	0.5	< 0.050
D021	Chlorobenzene	100.0	< 0.050
D022	Chloroform	6.0	< 0.050
D007	Chromium	5.0	< 0.050
D023	o-Cresol	200.0	< 0.200
D024	m-Cresol	200.0	< 0.200
D025	p-Cresol	200.0	< 0.200
D026	Cresol	200.0	< 0.200
D027	1,4-Dichlorobenzene	7.5	< 0.050
D028	1,2-Dichloroethane	0.5	< 0.050
D029	1,1-Dichloroethylene	0.7	< 0.050
D030	2,4-Dinitrotoluene	0.13	< 0.050
D032	Hexachlorobenzene	0.13	< 0.050
D033	Hexachlorobutadiene	0.5	< 0.050
D034	Hexachloroethane	3.0	< 0.050
D008	Lead	5.0	0.152
D009	Mercury	0.2	< 0.002
D035	Methyl ethyl ketone	200.0	< 0.100
D036	Nitrobenzene	2.0	< 0.050
D037	Pentachlorophenol	100.0	< 0.050
D038	Pyridine	5.0	< 0.050
D010	Selenium	1.0	< 0.002
D011	Silver	5.0	0.020
D039	Tetrachloroethylene	0.7	< 0.050
D040	Trichloroethylene	0.5	< 0.050
D041	2,4,5-Trichlorophenol	400.0	< 0.050
D042	2,4,6-Trichlorophenol	2.0	< 0.050
D043	Vinyl chloride	0.2	< 0.100

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Springfield Environmental Inc.

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TCLP LABORATORY ANALYSIS RESULTS

ATTN JOHN H SYKES
COLUMBUS COATED FABRICS
1280 N GRANT AVE
COLUMBUS OH 43201

Report Date: 11/7/91

(10)

SAMPLE ID: #724 Chrome Plating Sump LOG #: 5840-150
METALS ANALYST: Karen Anderson METALS ANALYZED: 11/4/91
ORGANICS ANALYST: Mike Schmidt ORGANICS ANALYZED: 11/7/91
METHODOLOGY: Volatiles by 8240, Semi-volatiles by 8270.

ANALYSIS

EPA HW NUMBER	CONTAMINANT	REGULATORY LEVEL(mg/l)	RESULTS(mg/l)
D004	Arsenic	5.0	< 0.002
D005	Barium	100.0	< 0.200
D018	Benzene	0.5	< 0.050
D006	Cadmium	1.0	< 0.020
D019	Carbon Tetrachloride	0.5	< 0.050
D021	Chlorobenzene	100.0	< 0.050
D022	Chloroform	6.0	< 0.050
D007	Chromium	5.0	1.504
D023	o-Cresol	200.0	< 0.200
D024	m-Cresol	200.0	< 0.200
D025	p-Cresol	200.0	< 0.200
D026	Cresol	200.0	< 0.200
D027	1,4-Dichlorobenzene	7.5	< 0.050
D028	1,2-Dichloroethane	0.5	< 0.050
D029	1,1-Dichloroethylene	0.7	< 0.050
D030	2,4-Dinitrotoluene	0.13	< 0.050
D032	Hexachlorobenzene	0.13	< 0.050
D033	Hexachlorobutadiene	0.5	< 0.050
D034	Hexachloroethane	3.0	< 0.050
D008	Lead	5.0	0.171
D009	Mercury	0.2	< 0.002
D035	Methyl ethyl ketone	200.0	< 0.100
D036	Nitrobenzene	2.0	< 0.050
D037	Pentachlorophenol	100.0	< 0.050
D038	Pyridine	5.0	< 0.050
D010	Selenium	1.0	< 0.002
D011	Silver	5.0	< 0.010
D039	Tetrachloroethylene	0.7	< 0.050
D040	Trichloroethylene	0.5	< 0.050
D041	2,4,5-Trichlorophenol	400.0	< 0.050
D042	2,4,6-Trichlorophenol	2.0	< 0.050
D043	Vinyl chloride	0.2	< 0.100

providing quality analytical and environmental services

Springfield Environmental Inc.

Page 1 of 2

&
Lockwood Laboratories

LABORATORY ANALYSIS RESULTS

ATTN JOHN H SYKES
COLUMBUS COATED FABRICS
1280 N GRANT AVE
COLUMBUS OH 43201

Report Date: 11/7/91

Report Released By:

Ed Lockwood Jr.
Ed Lockwood Jr., Pres.
P.O. Box 2728
1001 East St.
Springfield, OH 45501
513-324-8001

SAMPLE ID: #724 Chrome Plating Sump Sludge
SAMPLER: John Sykes
COUNTY: Franklin
SAMPLE TYPE: Grab
SAMPLE COLLECTED: 2:00pm 10/31/91
SAMPLE RECEIVED: 11/1/91

ANALYSIS

LABORATORY LOG No: 5840-150

Component (Units)	Result	Method	Analyst	Date
Paint Filter				
Free Liquid	FAIL	SW846 9095	TV	11/4/91
Ignitability				
Flashpoint (F)	>200	SW846 1010	EL	11/7/91
Corrosivity				
pH (S.U.)	5.8	SW846 9045	ST	11/1/91
Reactivity				
Sulfide (mg/l)	< 5.0	SW846 9030	ST	11/6/91
Cyanide (mg/l)	< 0.100	SW846 9010	BE	11/6/91
Copper, TCLP (mg/l)	3.001	1311/7210	KA	11/4/91
Zinc, TCLP (mg/l)	15.590	1311/7950	KA	11/4/91
BTU BTU/lb.	775		SR	11/5/91
% Solids (%)	2.6		ST	11/1/91

TCLP Methodology: TCLP extraction by SW846 1311. Volatiles
by SW846 8240. Semi-volatiles by SW846
8270. Metals by AA.

providing quality analytical and environmental services

Springfield Environmental Inc.

Page 1 of 2

&
Lockwood Laboratories

LABORATORY ANALYSIS RESULTS

ATTN JOHN H SYKES
COLUMBUS COATED FABRICS
1280 N GRANT AVE
COLUMBUS OH 43201

Report Date: 11/9/91

Report Released By:

Ed Lockwood Jr.
Ed Lockwood Jr., Pres.
P.O. Box 2728
1001 East St.
Springfield, OH 45501
513-324-8001

(11)

SAMPLE ID: Spent Muriatic Acid # 719
SAMPLER: John Sykes
COUNTY: Franklin
SAMPLE TYPE: Grab
SAMPLE COLLECTED: 2:00 p.m. 10/31/91
SAMPLE RECEIVED: 11/1/91

ANALYSIS

LABORATORY LOG No: 5835-150

Component (Units)	Result	Method	Analyst	Date
Paint Filter				
Free Liquid	FAIL	SW846 9095	TV	11/4/91
Ignitability				
Flashpoint (F)	> 200	SW846 1010	EL	11/1/91
Corrosivity				
pH (S.U.)	< 2.0	SW846 9045	TV	11/1/91
Reactivity				
Sulfide (mg/l)	< 1.0	SW846 9030	ST	11/6/91
Cyanide (mg/l)	< 0.020	SW846 9010	BE	11/6/91
Copper, TCLP (mg/l)	11.6	1311/7210	KA	11/4/91
Zinc, TCLP (mg/l)	14580.0	1311/7950	KA	11/4/91

TCLP Methodology: TCLP extraction by SW846 1311. Volatiles by SW846 8240. Semi-volatiles by SW846 8270. Metals by AA.

providing quality analytical and environmental services

Springfield Environmental Inc.

Page 2 of 2

*&
Lockwood Laboratories*

TCLP LABORATORY ANALYSIS RESULTS

ATTN JOHN H SYKES
COLUMBUS COATED FABRICS
P O BOX 208
COLUMBUS OH 43201

Report Date: 11/9/91

SAMPLE ID: Spent Muriatic Acid #719 LOG #: 5835-150
METALS ANALYST: Karen Anderson METALS ANALYZED: 11/4/91
ORGANICS ANALYST: Mike Schmidt ORGANICS ANALYZED: 11/8/91
METHODOLOGY: Volatiles by 8240, Semi-volatiles by 8270.

ANALYSIS

EPA HW NUMBER	CONTAMINANT	REGULATORY LEVEL(mg/l)	RESULTS(mg/l)
D004	Arsenic	5.0	< 0.002
D005	Barium	100.0	3.190
D018	Benzene	0.5	< 0.050
D006	Cadmium	1.0	0.684
D019	Carbon Tetrachloride	0.5	< 0.050
D021	Chlorobenzene	100.0	< 0.050
D022	Chloroform	6.0	< 0.050
D007	Chromium	5.0	64900.0
D023	o-Cresol	200.0	< 0.200
D024	m-Cresol	200.0	< 0.200
D025	p-Cresol	200.0	< 0.200
D026	Cresol	200.0	< 0.200
D027	1,4-Dichlorobenzene	7.5	< 0.050
D028	1,2-Dichloroethane	0.5	< 0.050
D029	1,1-Dichloroethylene	0.7	< 0.050
D030	2,4-Dinitrotoluene	0.13	< 0.050
D032	Hexachlorobenzene	0.13	< 0.050
D033	Hexachlorobutadiene	0.5	< 0.050
D034	Hexachloroethane	3.0	< 0.050
D008	Lead	5.0	4.317
D009	Mercury	0.2	< 0.002
D035	Methyl ethyl ketone	200.0	< 0.100
D036	Nitrobenzene	2.0	< 0.050
D037	Pentachlorophenol	100.0	< 0.050
D038	Pyridine	5.0	< 0.050
D010	Selenium	1.0	< 0.002
D011	Silver	5.0	1.500
D039	Tetrachloroethylene	0.7	< 0.050
D040	Trichloroethylene	0.5	< 0.050
D041	2,4,5-Trichlorophenol	400.0	< 0.050
D042	2,4,6-Trichlorophenol	2.0	< 0.050
D043	Vinyl chloride	0.2	< 0.100

providing quality analytical and environmental services

Springfield Environmental Inc.

Page 1 of 2

&
Lockwood Laboratories

LABORATORY ANALYSIS RESULTS

ATTN JOHN H SYKES
COLUMBUS COATED FABRICS
1280 N GRANT AVE
COLUMBUS OH 43201

Report Date: 11/9/91

Report Released By:

*Ed Lockwood Jr.*Ed Lockwood Jr., Pres.
P.O. Box 2728
1001 East St.
Springfield, OH 45501
513-324-8001

(12)

SAMPLE ID:	#725	DN-14 Liquid Urethane
SAMPLER:		John Sykes
COUNTY:		Franklin
SAMPLE TYPE:		Grab
SAMPLE COLLECTED:	2:00pm	10/31/91
SAMPLE RECEIVED:		11/1/91

ANALYSIS

LABORATORY LOG No: 5841-150

Component (Units)	Result	Method	Analyst	Date
Paint Filter				
Free Liquid	PASS	SW846 9095	TV	11/4/91
Ignitability				
Flashpoint (F)	78	SW846 1010	KA	11/9/91
Corrosivity				
pH (S.U.)	4.5	SW846 9045	ST	11/1/91
Reactivity				
Sulfide (mg/kg)	< 5.0	SW846 9030	ST	11/6/91
Cyanide (mg/kg)	< 1.0	SW846 9010	BE	11/6/91
Copper, TCLP (mg/l)	0.038	1311/7210	KA	11/4/91
Zinc, TCLP (mg/l)	0.064	1311/7950	KA	11/4/91
BTU BTU/lb.	13,358		SR	11/5/91
% Solids (%)	57.5		ST	11/7/91

TCLP Methodology: TCLP extraction by SW846 1311. Volatiles by SW846 8240. Semi-volatiles by SW846 8270. Metals by AA.

providing quality analytical and environmental services

Springfield Environmental Inc.

Page 2 of 2

& Lockwood Laboratories

TCLP LABORATORY ANALYSIS RESULTS

ATTN JOHN H SYKES
COLUMBUS COATED FABRICS
P O BOX 208
COLUMBUS OH 43201

Report Date: 11/9/91

SAMPLE ID: DN-14 Liquid Urethane # 725 LOG #: 5841-150
METALS ANALYST: Karen Anderson METALS ANALYZED: 11/4/91
ORGANICS ANALYST: Mike Schmidt ORGANICS ANALYZED: 11/8/91
METHODOLOGY: Volatiles by 8240, Semi-volatiles by 8270.

ANALYSIS

EPA HW NUMBER	CONTAMINANT	REGULATORY LEVEL(mg/l)	RESULTS(mg/l)
D004	Arsenic	5.0	< 0.002
D005	Barium	100.0	< 0.200
D018	Benzene	0.5	< 0.050
D006	Cadmium	1.0	< 0.020
D019	Carbon Tetrachloride	0.5	< 0.050
D021	Chlorobenzene	100.0	< 0.050
D022	Chloroform	6.0	< 0.050
D007	Chromium	5.0	< 0.050
D023	o-Cresol	200.0	< 0.200
D024	m-Cresol	200.0	< 0.200
D025	p-Cresol	200.0	< 0.200
D026	Cresol	200.0	< 0.200
D027	1,4-Dichlorobenzene	7.5	< 0.050
D028	1,2-Dichloroethane	0.5	< 0.050
D029	1,1-Dichloroethylene	0.7	< 0.050
D030	2,4-Dinitrotoluene	0.13	< 0.050
D032	Hexachlorobenzene	0.13	< 0.050
D033	Hexachlorobutadiene	0.5	< 0.050
D034	Hexachloroethane	3.0	< 0.050
D008	Lead	5.0	< 0.100
D009	Mercury	0.2	< 0.002
D035	Methyl ethyl ketone	200.0	< 0.100
D036	Nitrobenzene	2.0	< 0.050
D037	Pentachlorophenol	100.0	< 0.050
D038	Pyridine	5.0	< 0.050
D010	Selenium	1.0	< 0.002
D011	Silver	5.0	< 0.010
D039	Tetrachloroethylene	0.7	< 0.050
D040	Trichloroethylene	0.5	< 0.050
D041	2,4,5-Trichlorophenol	400.0	< 0.050
D042	2,4,6-Trichlorophenol	2.0	< 0.050
D043	Vinyl chloride	0.2	< 0.100

providing quality analytical and environmental services

COLUMBUS COATED FABRICS

Division of
BORDEN CHEMICAL, BORDEN INC.



November 15, 1991

RECEIVED

NOV 21 1991

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

U.S. EPA, REGION V
230 South Dearborn Street
Chicago, IL 60604
ATTENTION: Jane Neuman, RCRA Enforcement Branch, 5HR-12

Re: Columbus Coated Fabrics Spill Prevention & Countermeasures Plan

Dear Jane:

Attached is the updated version of "Section IV - Development of a Discharge Contingency Plan to be followed in event of a Release/Spill" reflecting revised Emergency Coordinators and telephone numbers. Emergency Coordinators were changed due to management changes at Columbus Coated Fabrics.

Please replace pages 29 through 33 dated October, 1990 in your copy of the "Columbus Coated Fabrics Spill Prevention and Countermeasures Plan" with pages 29 through 33A dated November, 1991.

Very truly yours,

Grover Thomas,
Environmental Manager
COLUMBUS COATED FABRICS

GT/rap
attach.

COLUMBUS COATED FABRICS

Division of
BORDEN CHEMICAL, BORDEN INC.



November 15, 1991

CERTIFIED MAIL RETURN RECEIPT REQUESTED

OEPA
Mr. Ken Schultz
Chief, Emergency Response Section
1800 WaterMark Drive
P.O. Box 1049
Columbus, OH 43266-0149

Re: Columbus Coated Fabrics Spill Prevention & Countermeasures Plan

Dear Ken:

Attached is the updated version of "Section IV - Development of a Discharge Contingency Plan to be followed in event of a Release/Spill" reflecting revised Emergency Coordinators and telephone numbers. Emergency Coordinators were changed due to management changes at Columbus Coated Fabrics.

Please replace pages 29 through 33 dated October, 1990 in your copy of the "Columbus Coated Fabrics Spill Prevention and Countermeasures Plan" with pages 29 through 33A dated November, 1991.

Very truly yours,

Grover Thomas,
Environmental Manager
COLUMBUS COATED FABRICS

GT/rap
attach.

COLUMBUS COATED FABRICS

Division of
BORDEN CHEMICAL, BORDEN INC.



November 15, 1991

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Michael J. Pompili, MS, RS
Assistant Health Commissioner
Environmental Health Division
Columbus Health Department
181 Washington Boulevard
Columbus, OH 43215-4096

Re: Columbus Coated Fabrics Spill Prevention & Countermeasures Plan

Dear Michael:

Attached is the updated version of "Section IV - Development of a Discharge Contingency Plan to be followed in event of a Release/Spill" reflecting revised Emergency Coordinators and telephone numbers. Emergency Coordinators were changed due to management changes at Columbus Coated Fabrics.

Please replace pages 29 through 33 dated October, 1990 in your copy of the "Columbus Coated Fabrics Spill Prevention and Countermeasures Plan" with pages 29 through 33A dated November, 1991.

Very truly yours,

Grover Thomas,
Environmental Manager
COLUMBUS COATED FABRICS

GT/rap
attach.

COLUMBUS COATED FABRICS

Division of
BORDEN CHEMICAL, BORDEN INC.



November 15, 1991

CERTIFIED MAIL RETURN RECEIPT REQUESTED

James Jackson, Police Chief
City of Columbus Police Division
120 West Gay Street
Columbus, OH 43215

Re: Columbus Coated Fabrics Spill Prevention & Countermeasures Plan

Dear James:

Attached is the updated version of "Section IV - Development of a Discharge Contingency Plan to be followed in event of a Release/Spill" reflecting revised Emergency Coordinators and telephone numbers. Emergency Coordinators were changed due to management changes at Columbus Coated Fabrics.

Please replace pages 29 through 33 dated October, 1990 in your copy of the "Columbus Coated Fabrics Spill Prevention and Countermeasures Plan" with pages 29 through 33A dated November, 1991.

Very truly yours,

Grover Thomas,
Environmental Manager
COLUMBUS COATED FABRICS

GT/rap
attach.

COLUMBUS COATED FABRICS

Division of
BORDEN CHEMICAL, BORDEN INC.



November 15, 1991

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Don Warner, Fire Chief
City of Columbus Division of Fire
200 Greenlawn Avenue
Columbus, OH 43223

Re: Columbus Coated Fabrics Spill Prevention & Countermeasures Plan

Dear Don:

Attached is the updated version of "Section IV - Development of a Discharge Contingency Plan to be followed in event of a Release/Spill" reflecting revised Emergency Coordinators and telephone numbers. Emergency Coordinators were changed due to management changes at Columbus Coated Fabrics.

Please replace pages 29 through 33 dated October, 1990 in your copy of the "Columbus Coated Fabrics Spill Prevention and Countermeasures Plan" with pages 29 through 33A dated November, 1991.

Very truly yours,

Grover Thomas,
Environmental Manager
COLUMBUS COATED FABRICS

GT/rap
attach.

COLUMBUS COATED FABRICS

Division of
BORDEN CHEMICAL, BORDEN INC.



November 15, 1991

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Doctors Hospital - North
Administration
1087 Dennison Avenue
Columbus, OH 43201

Re: Columbus Coated Fabrics Spill Prevention & Countermeasures Plan

Dear Sir:

Attached is the updated version of "Section IV - Development of a Discharge Contingency Plan to be followed in event of a Release/Spill" reflecting revised Emergency Coordinators and telephone numbers. Emergency Coordinators were changed due to management changes at Columbus Coated Fabrics.

Please replace pages 29 through 33 dated October, 1990 in your copy of the "Columbus Coated Fabrics Spill Prevention and Countermeasures Plan" with pages 29 through 33A dated November, 1991.

Very truly yours,

Grover Thomas,
Environmental Manager
COLUMBUS COATED FABRICS

GT/rap
attach.

COLUMBUS COATED FABRICS

Division of
BORDEN CHEMICAL, BORDEN INC.



November 15, 1991

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Grant Hospital
Administration
111 South Grant Avenue
Columbus, OH 43215

Re: Columbus Coated Fabrics Spill Prevention & Countermeasures Plan

Dear Sir:

Attached is the updated version of "Section IV - Development of a Discharge Contingency Plan to be followed in event of a Release/Spill" reflecting revised Emergency Coordinators and telephone numbers. Emergency Coordinators were changed due to management changes at Columbus Coated Fabrics.

Please replace pages 29 through 33 dated October, 1990 in your copy of the "Columbus Coated Fabrics Spill Prevention and Countermeasures Plan" with pages 29 through 33A dated November, 1991.

Very truly yours,

Grover Thomas,
Environmental Manager
COLUMBUS COATED FABRICS

GT/rap
attach.

COLUMBUS COATED FABRICS

Division of
BORDEN CHEMICAL, BORDEN INC.



November 15, 1991

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Riverside Hospital
Administration
3535 Olentangy River Road
Columbus, OH 43214

Re: Columbus Coated Fabrics Spill Prevention & Countermeasures Plan

Dear Sir:

Attached is the updated version of "Section IV - Development of a Discharge Contingency Plan to be followed in event of a Release/Spill" reflecting revised Emergency Coordinators and telephone numbers. Emergency Coordinators were changed due to management changes at Columbus Coated Fabrics.

Please replace pages 29 through 33 dated October, 1990 in your copy of the "Columbus Coated Fabrics Spill Prevention and Countermeasures Plan" with pages 29 through 33A dated November, 1991.

Very truly yours,

Grover Thomas,
Environmental Manager
COLUMBUS COATED FABRICS

GT/rap
attach.

COLUMBUS COATED FABRICS

Division of
BORDEN CHEMICAL, BORDEN INC.



November 15, 1991

CERTIFIED MAIL RETURN RECEIPT REQUESTED

University Hospital
Administration
450 West 10th Avenue
Columbus, OH 43210

Re: Columbus Coated Fabrics Spill Prevention & Countermeasures Plan

Dear Sir:

Attached is the updated version of "Section IV - Development of a Discharge Contingency Plan to be followed in event of a Release/Spill" reflecting revised Emergency Coordinators and telephone numbers. Emergency Coordinators were changed due to management changes at Columbus Coated Fabrics.

Please replace pages 29 through 33 dated October, 1990 in your copy of the "Columbus Coated Fabrics Spill Prevention and Countermeasures Plan" with pages 29 through 33A dated November, 1991.

Very truly yours,

Grover Thomas,
Environmental Manager
COLUMBUS COATED FABRICS

GT/rap
attach.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

SEP 13 1991

REPLY TO ATTENTION OF:
5CS-TUB-3

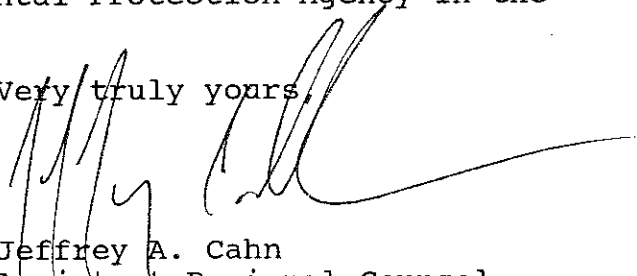
Judge Daniel M. Head
Office of Administrative Law Judges
United States Environmental
Protection Agency
Mail Code A-110
401 M Street, S.W.
Washington, D.C. 20460

RE: Borden, Inc., Columbus Coated Fabrics,
Docket No. V-W-91-R-4

Dear Judge Head:

Enclosed please find a copy of the Status Report filed today
by the United States Environmental Protection Agency in the
above-referenced matter.

Very truly yours,


Jeffrey A. Cahn
Assistant Regional Counsel
U.S. Environmental Protection
Agency
5CS-TUB-3
230 S. Dearborn Street
Chicago, Illinois 60604

(FTS/312) 886-6670

Enclosure

cc: Beverly Shorty
James F. Warchall
David J. Engel
Sheila B. Kennedy
Jane Neumann

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

BEFORE THE ADMINISTRATOR

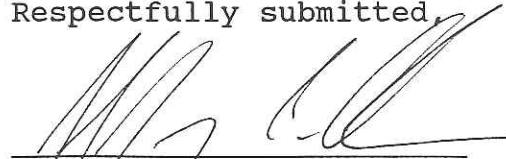
RECEIVED
REGIONAL HEARING
CLERK
1991 SEP 13 AM 9:51
US ENVIRONMENTAL
PROTECTION AGENCY
REGION V

In the Matter of:)
)
Borden, Inc., Columbus) Docket No. V-W-91-R-4
Coated Fabrics) Judge Daniel M. Head
1280 North Grant Avenue)
Columbus, Ohio)
)
EPA I.D. No.: OHD 004 294-351)

STATUS REPORT

Pursuant to this Court's Order of August 6, 1991, directing the filing of a status report on or before September 16, 1991, should the parties be unable to file the Consent Agreement and Final Order ("CAFO") by that date, Complainant, the United States Environmental Protection Agency, hereby reports that settlement negotiations are ongoing. On July 30, 1991, Complainant transmitted a CAFO to Respondent, Borden, Inc., Columbus Coated Fabrics. The CAFO reflected the terms of the agreement reached after the June 4, 1991, settlement conference. Respondent reviewed the CAFO and on September 10, 1991, transmitted a revised CAFO to Complainant for Complainant's review. The CAFO is expected to be finalized and signed in the near future.

Respectfully submitted,


Jeffrey A. Cahn
Assistant Regional Counsel
Office of the Regional Counsel
United States Environmental
Protection Agency, Region V
Mail Code 5CS-TUB-3
230 S. Dearborn Street
Chicago, Illinois 60604
(FTS/312) 886-6670

CERTIFICATE OF SERVICE

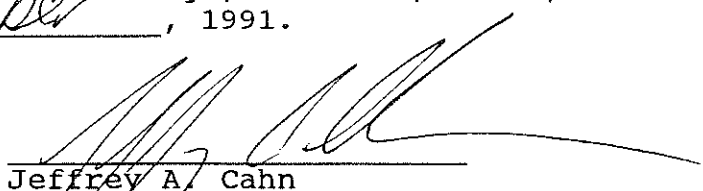
I, Jeffrey A. Cahn, hereby certify that I caused copies of the foregoing Status Report to be served via first-class United States mail, postage prepaid, on this 13 day of September, 1991, upon the following:

Judge Daniel M. Head
Office of Administrative Law Judges
United States Environmental
Protection Agency
Mail Code A-110
401 M Street, S.W.
Washington, D.C. 20460

and

James F. Warchall
David J. Engel
Sheila B. Kennedy
Sidley & Austin
One First National Plaza
Chicago, Illinois 60603

I further certify that I caused the original of the foregoing Status Report to be filed with the Regional Hearing Clerk located in the Planning and Management Division, U.S. EPA, Region V, 230 S. Dearborn Street, Chicago, Illinois, 60604, on this 13 day of September, 1991.


Jeffrey A. Cahn
Assistant Regional Counsel
Office of the Regional Counsel
United States Environmental
Protection Agency, Region V
Mail Code 5CS-TUB-3
230 S. Dearborn Street
Chicago, Illinois 60604
(FTS/312) 886-6670

SIDLEY & AUSTIN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

LOS ANGELES
NEW YORK
WASHINGTON, D.C.

ONE FIRST NATIONAL PLAZA
CHICAGO, ILLINOIS 60603
TELEPHONE 312: 853-7000
TELEX 25-4364
FACSIMILE 312: 853-7036

September 12, 1991

LONDON
SINGAPORE
TOKYO
JOINT OFFICE WITH
ASHURST MORRIS CRISP
TOKYO
ASSOCIATED WITH
HASHIDATE LAW OFFICE

WRITER'S DIRECT NUMBER

Mr. Jeffrey Cahn
Assistant Regional Counsel
United States Environmental
Protection Agency
230 S. Dearborn Street
Chicago, Illinois 60604

Re: Borden, Inc. Columbus Coated Fabrics

Dear Jeff:

As requested, please find enclosed a red-lined version of the CAFO. If you have any questions, please call me at 853-2224.

Yours truly,

Sheila Kennedy
Sheila B. Kennedy

Linda Holzrichter 6-0765

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF:)	DOCKET NO. V-W-91-R-4
BORDEN, INC., COLUMBUS COATED)	
FABRICS)	CONSENT AGREEMENT AND
1280 NORTH GRANT AVENUE)	FINAL ORDER
COLUMBUS, OHIO 43201)	
)	
EPA ID NO.: OHD 004 294 351)	

PREAMBLE

On March 12, 1991, a Complaint was filed in this matter pursuant to Section 3008(a)(1) of the Resource Conservation and Recovery Act ("RCRA") as amended, 42 U.S.C. Section 6928, and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. An Amended Complaint subsequently was filed. The Complainant is the Associate Division Director, Office of RCRA, Waste Management Division, Region V, United States Environmental Protection Agency ("U.S. EPA"). The Respondent is Borden, Inc., Columbus Coated Fabrics ("CCF").

STIPULATIONS

The parties, desiring to settle this action, enter into the following stipulations:

1. Respondent has been served with a copy of the Complaint, Findings of Violation and Compliance Order (Docket No. V-W-91-R-4) as well as the Amended Complaint in this matter.

2. Respondent is a New Jersey corporation whose registered agent in Ohio is Prentice-Hall Corporate System, 380 South Fifth Street, Columbus, Ohio 43215. Respondent owns and operates a facility located at 1280 North Grant Avenue, Columbus Ohio (the "facility").

3. Respondent admits the jurisdictional allegations contained in the Amended Complaint.

4. Respondent neither admits nor denies the specific factual allegations contained in the Amended Complaint other than the admissions made in Respondent's Answer.

5. Respondent explicitly waives its right to a hearing on the allegations contained in the Amended Complaint.

6. Should the Respondent fail to comply with any provision contained in the subsequent Final Order, Respondent waives any objection to U.S. EPA's jurisdiction to enforce the Final Order. ~~any rights it may possess in law or equity to challenge the authority of the U.S. EPA to bring a civil action in the appropriate United States district court to compel~~

left this up to the attorneys.

~~compliance with the Final Order and/or to seek an additional penalty for the non-compliance.~~

7. Respondent consents to the issuance of the Order hereinafter set forth and hereby consents to the payment of the amount hereinafter stipulated. ~~of a civil penalty in the amount therein specified.~~

They don't want to call it this. We won't agree to this change.

8. This Consent Agreement and Final Order shall become effective on the date it is signed by the Director, Waste Management Division.

FINAL ORDER

Based on the foregoing stipulations, the Parties agree to the entry of the following Final Order:

A. Respondent shall, immediately upon the effective date of this Final Order, (except as otherwise specified below), cease all treatment, storage or disposal of any hazardous waste except such treatment, storage or disposal as shall be in compliance with the conditions of its hazardous waste permit, or as provided in Paragraphs B through E below.

~~B. Respondent shall, immediately upon the effective date of this Final Order, (except as otherwise specified below),~~

We need to know why they are concerned w/ this. We could agree to something like, "shall continue to maintain compliance."

~~achieve and maintain compliance with the standards applicable to generators of hazardous waste.~~

B. Respondent shall, within thirty (30) days of the effective date of this Final Order, maintain sample logs and records of hazardous waste monitoring containing the following information:

1. Sample log:

- (a) Type of sample taken;
- (b) Method used to obtain sample; and
- (c) Date it was sent to the Stilson laboratory for analysis.

2. Records of monitoring information:

- (a) The dates, exact place, and times of sampling or measurements;
- (b) The individuals who performed the sampling or measurements;
- (c) The dates analyses were performed;
- (d) The individuals who performed the analyses;
- (e) The analytical techniques or methods used; and
- (f) The results of such analyses.

C. Respondent shall, within 30 days of the effective date of this Final Order, provide review of training to its hazardous waste personnel and shall document such review in its

operating record. The Respondent shall, thereafter, provide such review twice yearly as required by the conditions of its permit.

D. Respondent shall, within ten (10) days of the effective date of this Final Order, submit a modification for its permit, according to procedures set forth in 40 CFR 270.42, to designate a new Emergency Coordinator and alternatives. Within twenty (20) days thereafter, Respondent shall provide the U.S. EPA with a copy of an amended contingency plan reflecting these changes.

Must Teacher keep this or insert @ sentence calling for a submission of permit mod.

E. Respondent shall notify U.S. EPA in writing within 5 days after achieving compliance with all of the requirements of this Final Order. ~~or any part thereof.~~ The notification(s) of compliance shall be attested to by a responsible official who shall state: ~~"I certify that the information contained in or accompanying this notification of compliance is true, accurate, and complete."~~

She'll check w/ Ruff Nelson to see if 1/2 is required.

This notification shall be submitted no later than the time stipulated above to the Waste Management Division, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, Attention: Jane Neumann, RCRA Enforcement Branch, 5HR-12.

F. A copy of these documents and all correspondence with U.S. EPA regarding this Final Order shall also be submitted to Michael Savage, Assistant Chief, Inspections and Enforcement

Programs, Division of Solid and Hazardous Waste Management, Ohio Environmental Protection Agency, Post Office Box 1049, Columbus, Ohio 43266-0149.

keep
G. Respondent shall pay ~~a civil penalty~~ the amount of TWO THOUSAND DOLLARS (\$2,000.00) within thirty (30) days of the effective date of this Final Order. Payment shall be made by certified or cashier's check payable to the Treasurer of the United States of America and shall be mailed to U.S. EPA, Region V, P.O. Box 70753, Chicago, Illinois 60673. The facility name and docket number (V-W-91-R-4) shall be printed on said payment. Copies of the transmittal of the payment should be sent to both the Regional Hearing Clerk, Planning and Management Division (5MF-14), and the Solid Waste and Emergency Response Branch Secretary, Office of Regional Counsel (5CS-TUB-3), U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604.

The U.S. EPA may collect interest on any amounts overdue under the terms of this Final Order at the rate established by the Secretary of the Treasury pursuant to 31 U.S.C. Section 3717. A late payment handling charge of \$20.00 will be imposed on any late payment, with an additional charge of \$10.00 for each subsequent 30-day period over which an unpaid balance remains.

Failure to comply with any requirement of this Final Order may subject Respondent to liability for a penalty of up to TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00) for each day of continued non-compliance with the terms of the Final Order. U.S. EPA is authorized to assess such penalties pursuant to RCRA Section 3008(c).

The Final Order constitutes a settlement and final disposition of the Complaint and the Amended Complaint filed in this case and the stipulations herein before recited. Plaintiff covenants not to sue CCF for any further civil liability or penalties for matters covered in the Complaint and Amended Complaint. This release is intended to apply so long as CCF is in compliance with the terms of this Final Order.

Leave this to the attorneys

Notwithstanding any other provision of this Final Order, an enforcement action may be brought pursuant to Section 7003 of RCRA, 42 U.S.C. Section 6973, or other statutory authority should U.S. EPA find that the handling, storage, treatment, transportation, or disposal of solid waste or hazardous waste at the facility may present an imminent and substantial endangerment to health or the environment. U.S. EPA also expressly reserves the right to take any action necessary under Section 3008 of RCRA to enforce compliance with the applicable provision of Ohio Administrative Code; 40 CFR Parts 124 and 270; and this Final Order.

SIGNATORIES

Each undersigned representative of a Party to this Consent Agreement and Final Order consisting of seven pages certifies that he or she is fully authorized to enter into the terms and conditions of this Consent Agreement and Final Order and to legally bind such party to this document.

Agreed to this _____ day of _____, 1991.

By: _____
For Borden, Inc., Columbus Coated Fabrics
Respondent

Title: _____

Agreed to this _____ day of _____, 1991.

By: _____
William E. Muno,
Associate Division Director
Office of RCRA
Waste Management Division
U.S. Environmental Protection Agency
Region V, Complainant

The above agreed and consented to, it is so ordered
this _____ day of _____, 1991.

David A. Ullrich, Director
Waste Management Division
U.S. Environmental Protection Agency
Region V

IN THE MATTER OF:
BORDEN, INC., COLUMBUS COATED
FABRICS
1280 North Grant Avenue
Columbus, Ohio 43201
DOCKET NO. V-W-91-R-4



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

VIA EXPRESS MAIL &
U.S. MAIL

5CS-TUB-3

Judge Daniel M. Head
Office of Administrative Law Judges
United States Environmental
Protection Agency
Mail Code A-110
401 M Street, S.W.
Washington, D.C. 20460

RE: Borden, Inc., Columbus Coated Fabrics,
Docket No. V-W-91-R-4

Dear Judge Head:

Enclosed please find a copy of the Motion for Enlargement of Time filed today by the United States Environmental Protection Agency in the above-referenced matter. Also enclosed please find courtesy copies of the Motion for Leave to File Amended Complaint Instant and Amended Complaint previously filed and served in this matter.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Jeffrey A. Cahn".

Jeffrey A. Cahn
Assistant Regional Counsel
U.S. Environmental Protection
Agency
5CS-TUB-3
230 S. Dearborn Street
Chicago, Illinois 60604
(FTS/312) 886-6670

Enclosure

cc: Beverly Shorty
Sheila Kennedy (Motion for Enlargement encl.)
Jane Neumann

1991 AUG -7 PM 1:10

US ENVIRONMENTAL
PROTECTION AGENCY
REGION V

In the Matter of:)
)
Borden, Inc., Columbus) Docket No. V-W-91-R-4
Coated Fabrics)
1280 North Grant Avenue) Judge Daniel M. Head
Columbus, Ohio)
)
)
)
EPA I.D. No.: OHD 004 294-351)

MOTION FOR ENLARGEMENT OF TIME

Pursuant to Sections 22.16 and 22.07(b) of the Rules of Practice ("Rules"), 40 C.F.R. Secs. 22.16; 22.07(b), and prior Order of this Court, Complainant, the United States Environmental Protection Agency, hereby requests a second extension of forty-five (45) days time within which the parties may submit a signed Consent Agreement and Final Order to the Court or, in the alternative, for the parties to complete their prehearing exchange. In further support of this Motion, Complainant states as follows:

1. On April 26, 1991, this Court issued its "Order Setting Prehearing Procedures" (the "Order") in this matter. In the Order, the Court established, inter alia, that Complainant was to file a Status Report with the Court on or before May 27, 1991. In the Order, the Court also established that absent an extension, the parties were either to complete their prehearing exchange or, in the alternative, submit a signed Consent Agreement and Final Order to the Court on, or before, June 28, 1991.

2. Complainant's Status Report was filed on May 17, 1991. As indicated in the Status Report, Complainant and Respondent, Borden, Incorporated, Columbus Coated Fabrics, met for purposes of discussing settlement on June 4, 1991. The parties have subsequently held several telephone conferences, also for purposes of exploring settlement. Pursuant to these discussions, Complainant has received certain additional information from the Respondent relating to the allegations of the Complaint. This additional information has been reviewed by Complainant and, in light of that information, Complainant filed, on July 30, 1991, an amended complaint that drops one the allegations in the Complaint, subject to the approval of this Court as provided at Section 22.14(d) of the Rules.

3. As a result of the settlement conference and the subsequent telephone conferences, the parties have also reached a settlement in principle of the remaining allegations in the Complaint.

4. On June 26, 1991, Complainant requested an extension of time of forty-five (45) days, or until August 12, 1991, for the parties to submit a signed Consent Agreement and Final Order to the Court or, in the alternative, for the parties to complete their prehearing exchange. That motion was not objected to by Respondent, and Complainant was informed telephonically by the Court's clerk that the motion had been granted.

5. Complainant has prepared a Consent Agreement Final Order ("CAFO"), which Complainant provided to Respondent on July

30, 1991 (a copy of the amended complaint was provided to Respondent on August 7, 1991), for review and signature.

6. In order for Respondent to have sufficient time to review the CAFO, and in order for the parties to have sufficient time to obtain the necessary approvals of, and signatures to, the CAFO, the parties will require an additional extension of time of forty-five (45) days from August 12, 1991 (or until Thursday, September 26, 1991). In the alternative, in the event that the parties are not able to formalize their settlement in principle in a CAFO before September 26, 1991, the parties will complete their prehearing exchange on that date.

7. The date for the completion of the parties' prehearing exchange or, alternatively, the submission to the Court of a signed CAFO, August 12, 1991, has not passed.

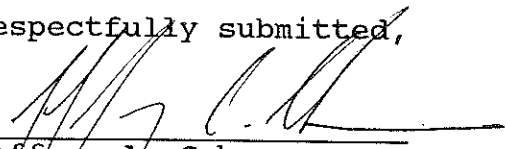
8. On August 7, 1991, Counsel for Complainant contacted Respondent regarding this Motion of Complainant requesting an extension of time. Counsel for Respondent indicated that Respondent was not opposed to this Motion.

9. Because this Motion is timely, because good cause exists for granting this Motion, and because Respondent does not object and will not be prejudiced thereby, this Court should grant this Motion and allow an extension of time of forty-five (45) days (or until September 26, 1991) from the date on which the prehearing exchange is currently to be completed or, in the alternative, on which a signed CAFO is to be submitted to the

Court, for the parties to complete their prehearing exchange or, alternatively, to submit a signed CAFO.

WHEREFORE, Complainant, the United States Environmental Protection Agency, moves this Court for an Order granting an extension of time until September 26, 1991, for the parties' prehearing exchange or the submission by the parties of a signed Consent Agreement and Final Order.

Respectfully submitted,



Jeffrey A. Cahn
Assistant Regional Counsel
Office of the Regional Counsel
United States Environmental
Protection Agency, Region V
Mail Code 5CS-TUB-3
230 S. Dearborn Street
Chicago, Illinois 60604
(FTS/312) 886-6670

CERTIFICATE OF SERVICE

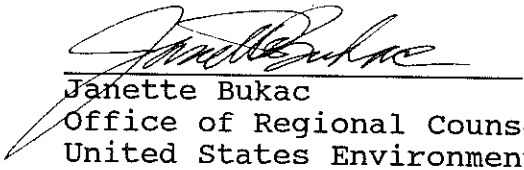
I, Janette Bukac, hereby certify that I caused copies of the foregoing Motion for Enlargement of Time to be served via first-class United States mail, postage prepaid, on this 7 day of August, 1991, upon the following:

Judge Daniel M. Head
Office of Administrative Law Judges
United States Environmental
Protection Agency
Mail Code A-110
401 M Street, S.W.
Washington, D.C. 20460

and

James F. Warchall
David J. Engel
Sheila Kennedy
Sidley & Austin
One First National Plaza
Chicago, Illinois 60603

I further certify that I caused the original of the foregoing Motion for Enlargement of Time to be filed with the Regional Hearing Clerk located in the Planning and Management Division, U.S. EPA, Region V, 230 S. Dearborn Street, Chicago, Illinois, 60604, on this 7 day of August, 1991.


Janette Bukac
Office of Regional Counsel
United States Environmental
Protection Agency, Region V
Mail Code 5CS-TUB-3
230 S. Dearborn Street
Chicago, Illinois 60604

JUL 30 1991

5HR-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James Warchall
Sidley & Austin
One First National Plaza
Chicago, Illinois 60603

Re: Consent Agreement and Final Order
Borden, Inc., Columbus Coated Fabrics
OHD 004 294 351

Dear Mr. Warchall:

Enclosed please find a Consent Agreement and Final Order (CAFO) for Borden, Inc., Columbus Coated Fabrics, as well as an Amended Complaint and a Motion for Leave to File an Amended Complaint. The CAFO reflects the terms of the agreement reached after the June 4, 1991, settlement conference.

You may return the signed CAFO to me at U.S. Environmental Protection Agency, Office of Regional Counsel (5CS-TUB-3), 230 South Dearborn Street, Chicago, Illinois 60604.

If you have any questions, please contact me at (312) 886-6670.

Sincerely yours,

Jeffrey Cahn,
Assistant Regional Counsel

Enclosure

cc: Michael Savage, OEPA-w/encl. ✓
W. Bailey Barton, w/encl. ✓
Director

Environmental Affairs
Borden, Inc.
1280 North Grant Avenue
Columbus, Ohio 43201

bcc: Jane Neumann, REB ✓
Uylaine McMahan, REB ✓

5HR-JCK-\Jane\Phyllis\6-8093\Jane\Warchall.1tr\July 17, 1991

ORC	ASST. REGIONAL COUNSEL	S.W.E.P. SEC. CHIEF	S.W.E.R. BR. CHIEF	REGIONAL COUNSEL
INIT. DATE				

SIGNATURE/INITIAL CONCURRENCE REQUESTED - RCRA ENFORCEMENT BRANCH (REB)									
TYP.	AUTH	IL/IN TES CHIEF	MI/WI TES CHIEF	MN/OH TES CHIEF	IL/MI/WI EPS CHIEF	IN/MN/OH EPS CHIEF	REB BRANCH CHIEF	RCRA ASSOC. DIR.	WMD DIVISION DIRECTOR
PH	JN					UEM 7/25/91		UEM 7/30/91	

copy sent to judge DC

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF:
BORDEN INC., COLUMBUS COATED FABRICS
1280 NORTH GRANT AVENUE
COLUMBUS, OHIO

EPA I.D. NO: OHD 004 294 351

) DOCKET NO. V-W-91-R-4

) FIRST AMENDED COMPLAINT, FINDINGS OF
) VIOLATION AND COMPLIANCE ORDER

PREAMBLE

This Amended Complaint is filed pursuant to Section 3008(a)(1) of the Resource Conservation and Recovery Act of 1976, as amended (RCRA), 42 U.S.C.

§6928(a)(1) and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Associate Division Director, Office of RCRA, Waste Management Division, Region V, United States Environmental Protection Agency (U.S. EPA). The Respondent is Borden, Inc., Columbus Coated Fabrics (CCF).

The Amended Complaint is based on information obtained by the U.S. EPA, including a compliance inspection of the CCF facility at 1280 N. Grant Avenue, Columbus, Ohio, conducted by the Ohio Environmental Protection Agency (OEPA), on September 7, 1990. At the time of the inspection, violations of certain applicable Federal regulations were identified. Pursuant to 42 U.S.C. §6928(a)(1), and based on the information cited above, it has been determined that the Respondent has also violated certain provisions of the Final Permit issued to CCF on September 27, 1984, by the U.S. EPA.

P 246 527 621

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO		JUDGE D. HEAD	
STREET AND NO.		US EPA 401 "M" ST.	
P.O. STATE AND ZIP CODE		Washington, DC	
POSTAGE	\$ 1.21		
CERTIFIED FEE	1.00		
SPECIAL DELIVERY			
RESTRICTED DELIVERY			
SHOW TO WHOM AND DATE DELIVERED	1.00		
SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY			
SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY			
SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY			
RETURN RECEIPT SERVICE			
OPTIONAL SERVICES			
CONSULT POSTMASTER FOR FEES			
TOTAL POSTAGE AND FEES			
POSTMARK OR DATE			

PS Form 3800, Apr. 1976

P 246 527 620

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO		J. Warchell	
STREET AND NO.		Sidley & Austin	
P.O. STATE AND ZIP CODE		One First Natl. Plaza Chicago, IL	
POSTAGE	\$ 2.20		
CERTIFIED FEE	1.00		
SPECIAL DELIVERY			
RESTRICTED DELIVERY			
SHOW TO WHOM AND DATE DELIVERED	1.00		
SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY			
SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY			
SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY			
RETURN RECEIPT SERVICE			
OPTIONAL SERVICES			
CONSULT POSTMASTER FOR FEES			
TOTAL POSTAGE AND FEES			
POSTMARK OR DATE			

PS Form 3800, Apr. 1976

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to: J. WARCHELL Sidley & Austin 1 First Natl. Plaza Chicago, IL 60603	4. Article Number 246 527 620 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature — Addressee X <i>A. Johnson</i>	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature — Agent X	
7. Date of Delivery JUL 31 1991	

PS Form 3811, Apr. 1989

*U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to: JUDGE HEAD US EPA 401 "M" ST SW Washington, DC	4. Article Number 246 527 621 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature — Addressee X <i>Christopher Dean</i> Christopher Dean	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature — Agent X Environmental Protection Agency Washington, DC 20460	
7. Date of Delivery AUG 02 1991	

PS Form 3811, Apr. 1989

*U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT

UNITED STATES POSTAL SERVICE

OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.



PENALTY FOR PRIVATE
USE, \$300

5HR-12

Newman

RETURN
TO



Print Sender's name, address, and ZIP Code in the space below.

UNITED STATES OF AMERICA
ENVIRONMENTAL PROTECTION AGENCY
230 S. DEARBORN
CHICAGO IL 60604

UNITED STATES POSTAL SERVICE

OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.



PENALTY FOR PRIVATE
USE, \$300

5HR-12

Newman

RETURN
TO



Print Sender's name, address, and ZIP Code in the space below.

UNITED STATES OF AMERICA
ENVIRONMENTAL PROTECTION AGENCY
230 S. DEARBORN
CHICAGO IL 60604

JURISDICTION

Jurisdiction for this action is conferred upon U.S. EPA by Sections 2002(a)(1) and 3008 of RCRA, 42 U.S.C. §6912(a)(1), and §6928, respectively.

FINDINGS OF VIOLATION

This determination of violation is based on the following:

1. Respondent, Borden, Inc., Columbus Coated Fabrics, is a person as defined by Section 1004(15), of RCRA, 42 U.S.C. §6903(15), who owns and operates a facility at 1280 North Grant Avenue, Columbus, Ohio, that generates and stores hazardous waste. Respondent is a New Jersey Corporation whose registered agent in Ohio is Prentice-Hall Corporate System, 380 South Fifth Street, Columbus, Ohio 43215.
2. Section 3010(a) of RCRA, 42 U.S.C. §6930(a), requires any person who generates or transports hazardous waste, or owns or operates a facility for the treatment, storage, or disposal of hazardous waste, to notify U.S. EPA of such activity within 90 days of the promulgation of regulation under Section 3001 of RCRA, 42 U.S.C. §6921. Section 3010(a) of RCRA, 42 U.S.C. §6930, also provides that no hazardous waste subject to regulation may be transported, treated, stored, or disposed of unless the required notification has been given.
3. U.S. EPA first published regulations concerning the generation, transportation, treatment, storage or disposal of hazardous waste on May 19, 1980. These regulations are codified at 40 CFR Parts 260 et seq.

Notification to U.S. EPA of hazardous waste activity was required in most instances no later than August 18, 1980.

4. Section 3005(a) of RCRA requires U.S. EPA to publish regulations requiring each person owning or operating a hazardous waste treatment, storage, or disposal facility to obtain a RCRA permit. Such regulations were published on May 19, 1980, and are codified at 40 CFR Parts 270 and 271 (formerly Parts 122 and 123). The regulations require that persons who treat, store, or dispose of hazardous waste submit Part A of the permit application in most instances by no later than November 19, 1980. These regulations authorize the Regional Administrator to require submission of Part B of the permit application.

5. Section 3005(c) of RCRA provides for issuance by the Administrator of the U.S. EPA of a permit for treatment, storage or disposal of hazardous waste.

6. On August 18, 1980, Respondent, as Columbus Coated Fabrics, filed a notification of hazardous waste activity for this facility with U.S. EPA pursuant to Section 3010 of RCRA. On March 26, 1982, Respondent notified the U.S. EPA of a change in its name to Borden, Inc., Columbus Coated Fabrics.

7. On November 19, 1980, Respondent filed Part A of the permit application with the U.S. EPA. On March 31, 1982, the U.S. EPA requested that the Respondent submit Part B of the permit application. The Respondent submitted Part B to U.S. EPA on October 3, 1982. A RCRA permit to store hazardous waste was issued to Respondent for this facility on September 27, 1984. A third party request for review of that permit, filed November 7, 1984, was later withdrawn before it was considered by the administrative law judge. The final permit became effective on August 25, 1985.

8. The State of Ohio, at the time the permit was issued and effective, was not authorized to administer and enforce a State hazardous waste program under RCRA. The State of Ohio later obtained such authorization.

9. The Respondent's hazardous waste activity consists of generating and storing dust stop waste, spent halogenated solvents, spent non-halogenated solvents, still bottoms from recovery of spent non-halogenated solvents and electroplating sludge. These wastes have been identified and listed as hazardous waste under Section 3001 of the Act (U.S. EPA Hazardous Waste Nos. D006, F002, F003, F005 and F006).

10. On September 7, 1990, the OEPA conducted a RCRA inspection of Respondent's facility and observed the following violations:

A. The permit states, in part, in II. General Facility Conditions, at C. General Waste Analysis, "The Permittee shall follow the procedures described in the attached Waste Analysis Plan, Attachment II." The Waste Analysis Plan states, in part, at (3)(v) Sample Log, "A sample log is maintained stating type of sample taken, method used to obtain sample and the date it was sent to the Stilson Laboratory for analysis." The permit further states, in part, in I. Standard Conditions, at D.9 (c), "Records of monitoring information shall specify:

- (i) The dates, exact place, and times of sampling or measurements;
- (ii) The individuals who performed the sampling or measurements;
- (iii) The dates analyses were performed;

- (iv) The individuals who performed the analyses;
- (v) The analytical techniques or methods used; and
- (vi) The results of such analyses."

Since the records of sampling and analysis for EPA waste codes F003, F005 and F006 kept by Respondent did not contain the information required by these permit conditions, the Respondent was in violation of the permit and of 40 CFR 270.30(a), which requires permittees to comply with all permit conditions.

B. The permit states, in part, in II. General Facility Conditions, at F. Personnel Training, "The Permittee shall conduct personnel training as required by 40 CFR 264.16. This training program shall follow the attached outline, Attachment (IV). The permittee shall maintain training documents and records as required by 40 CFR 264.16(d) and (e)." Attachment IV states, in part, at (12)(xii) [on page 100g of Attachment IV], "Employees are required to meet twice per year for review and update of this training program." Since Respondent's training records do not reflect review of training at the specified interval, the Respondent was in violation of the permit and of 40 CFR 270.30(a), which requires permittees to comply with all permit conditions.

C. The permit states, in part, in Attachment V, Contingency Plan, at IV.A. Notification Procedure for Spill [pages 63, 64 and 65 of the attachment], that N.L. Orr (also referred to as Norman Orr) is the designated Emergency Coordinator for the facility. Alternate Emergency Coordinator designees listed are S.E. Lizer, M.E. Hawse, L.T. Poteet,

S.W. Morris and D.H. Bibb. At the time of the OEPA inspection on September 7, 1990, N.L. Orr was no longer employed by the Respondent and another emergency coordinator had been designated. In addition, none of the five alternate emergency coordinator designees named in the permit any longer has that responsibility. The regulations list "Changes in name, address or phone number of coordinators or other persons or agencies identified in the plan," (under 40 CFR 270.42, Appendix I, Item B.6. Contingency Plan, at d) as a Class 1 modification of a permit. The regulations for Class 1 modifications require notification of the U.S. EPA Regional Administrator or the State Director of such modification by certified mail within seven (7) calendar days after the change is put into effect. Since no such notification was made to the U.S. EPA or to the OEPA, the Respondent was in violation of 40 CFR 270.42.

COMPLIANCE ORDER

Respondent having been initially determined to be in violation of the above cited rules and regulations, the following Compliance Order pursuant to Section 3008 of RCRA, 42 U.S.C. §6928, is entered:

A. Respondent shall immediately upon this Order becoming final, cease all treatment, storage or disposal of any hazardous waste except such treatment, storage, or disposal that is in complete compliance with the conditions of its hazardous waste permit, except as provided in Paragraph B below.

B. Respondent shall, within thirty (30) days of this Order becoming final, maintain sample logs and records of hazardous waste monitoring containing the following information:

1. Sample log:

- (a) Type of sample taken;
- (b) Method used to obtain sample; and
- (c) Date it was sent to the Stilson Laboratory for analysis.

2. Records of monitoring information:

- (a) The dates, exact place, and times of sampling or measurements;
- (b) The individuals who performed the sampling or measurements;
- (c) The dates analyses were performed;
- (d) The individuals who performed the analyses;
- (e) The analytical techniques or methods used; and
- (f) The results of such analyses.

C. Respondent shall, within 30 days of this Order becoming final, provide review of training to its hazardous waste personnel and shall document such review in its operating record. The Respondent shall, thereafter, provide such review twice yearly as required by the conditions of its permit.

D. Respondent shall, within ten (10) days of this Order becoming final, submit a modification for its permit, according to procedures set forth in 40 CFR 270.42, to designate a new Emergency Coordinator and alternates. Within twenty (20) days thereafter, Respondent shall provide the U.S. EPA with a copy of an amended contingency plan reflecting these changes.

E. Respondent shall notify U.S. EPA in writing upon achieving compliance with this Order and any part thereof. This notification shall be submitted no later than the time stipulated above to the U.S. EPA, Region V, Waste

Management Division, 230 South Dearborn Street, Chicago, Illinois 60604.

Attention: Jane Neumann, RCRA Enforcement Branch, 5HR-12.

A copy of these documents and all correspondence with U.S. EPA regarding this Order shall also be submitted to Michael Savage, Assistant Chief, Inspections and Enforcement Programs, Division of Solid and Hazardous Waste Management, Ohio Environmental Protection Agency, Post Office Box 1049, Columbus, Ohio 43266-0149.

Notwithstanding any other provisions of this Order, an enforcement action may be brought pursuant to Section 7003 of RCRA or other statutory authority where the handling, storage, treatment, transportation, or disposal of solid or hazardous waste at this facility may present an imminent and substantial endangerment to human health or the environment.

PROPOSED CIVIL PENALTY

In view of the above determination and in consideration of the seriousness of the violations cited herein, the potential harm to human health and the environment, the continuing nature of the violations, and the ability of the Respondent to pay penalties, the Complainant proposes to assess a civil penalty in the amount of TWO THOUSAND ONE HUNDRED DOLLARS (\$2,100) against the Respondent, pursuant to Sections 3008(c) and 3008(g) of RCRA, 42 U.S.C. §6928. Attachment 1 of the Amended Complaint provides a detailed summary of the proposed civil penalty. Payment shall be made by certified or cashier's check payable to the Treasurer of the United States of America and shall be mailed to U.S. EPA, Region V, P.O. Box 70753, Chicago, Illinois 60673. Copies of the transmittal of the payment should be sent to both the Regional Hearing Clerk, Planning and Management Division (5MF-14), and the Solid Waste and Emergency

Response Branch Secretary, Office of Regional Counsel (5CS-TUB-3), U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604.

Failure to comply with any requirements of the Order shall subject the above named Respondent to liability for a civil penalty of up to TWENTY-FIVE THOUSAND DOLLARS (\$25,000) for each day of continued noncompliance with the deadlines contained in this Order. U.S. EPA is authorized to assess such penalties pursuant to RCRA Section 3008(c). U.S. EPA may collect interest on any amount overdue under the terms of this Compliance Order at the rate established by the Secretary of the Treasury pursuant to 31 U.S.C. §3717.

A late payment handling charge of \$20.00 will be imposed on any late payment, with an additional charge of \$10.00 for any subsequent 30-day period over which an unpaid balance remains. In addition, a six percent per annum penalty will be applied on any principal amount not paid within ninety (90) days of the date on which payment is due.

NOTICE OF OPPORTUNITY FOR HEARING

The above-named Respondent has the right to request a hearing to contest any material, factual allegation set forth in the Amended Complaint and Compliance Order or the appropriateness of any proposed compliance schedule or penalty. Unless Respondent has filed an answer not later than twenty (20) days from the date this Amended Complaint is served, Respondent may be found in default of the above Amended Complaint and Compliance Order. U.S. EPA may collect interest on any amount overdue under the terms of this Compliance Order at the rate established by the Secretary of the Treasury pursuant to 31 U.S.C. §3717. A late payment handling charge of \$20.00 will be imposed on any late payment, with an additional charge of \$10.00 for any subsequent 30-day period over

which an unpaid balance remains. In addition, a six percent per annum penalty will be applied on any principal amount not paid within ninety (90) days of the date on which payment is due.

To avoid a finding of default by the Regional Administrator you must file a written answer to this Amended Complaint with the Regional Hearing Clerk, Planning and Management Division, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, within twenty (20) days of receipt of this notice.

A copy of your answer and any subsequent documents filed in this action should be sent to Jeffrey Cahn, Assistant Regional Counsel (5CS-TUB-3), at the same address. Failure to answer within twenty days of receipt of this Amended Complaint may result in a finding by the Regional Administrator that the entire amount of penalty sought in the Amended Complaint is due and payable and subject to interest and penalty provisions contained in the Federal Claims Collection Act of 1966, 31 U.S.C. §3701 et seq.

Respondent's answer should clearly and directly admit, deny, or explain each of the factual allegations of which Respondent has knowledge. Said answer should contain (1) a definite statement of the facts which constitute the grounds of defense, and (2) a concise statement of the facts which Respondent intends to place at issue in the hearing. The denial of any material fact, or the raising of any affirmative defense, shall be construed as a request for a hearing.

The Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22,

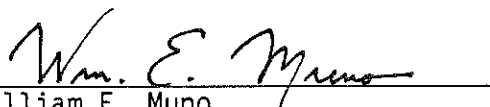
are applicable to this administrative action. A copy of these Rules is enclosed with this Amended Complaint.

SETTLEMENT CONFERENCE

Whether or not Respondent requests a hearing, Respondent may confer informally with U.S. EPA concerning: (1) whether the alleged violations in fact occurred as set forth above; (2) the appropriateness of the compliance schedule; and (3) the appropriateness of any proposed penalty in relation to the size of Respondent's business, the gravity of the violations, and the effect of the proposed penalty on Respondent's ability to continue in business. Respondent may request an informal settlement conference at any time by contacting this office. Any such request, however, will not affect either the twenty-day time limit for responding to this Amended Complaint or the thirty-day time limit for requesting a formal hearing on the violations alleged herein.

U.S. EPA encourages all parties to pursue the possibilities of settlement through informal conference. A request for an informal conference should be made in writing to Jane Neumann, RCRA Enforcement Branch (5HR-12), U.S. Environmental Protection Agency, at the address cited above, or by calling her at (312) 886-2871.

Dated this 30th day of July, 1991.


William E. Muno
Associate Division Director
Office of RCRA
Waste Management Division
U.S. Environmental Protection Agency
Region V, Complainant

CERTIFICATION OF SERVICE

I hereby certify that I have caused a copy of the foregoing Amended Complaint to be served upon the persons designated below, on the date below, by causing said copies to be deposited in the U.S. Mail, First Class and certified-return receipt requested, postage prepaid, at Chicago, Illinois, in envelopes addressed to:

Judge Daniel M. Head
Office of Administrative Law Judges
United States Environmental Protection Agency
A-110
401 M. Street, S.W.
Washington, D.C. 20460

and

James F. Warchall, Counsel for Respondent
Sidley & Austin
One First National Plaza
Chicago, Illinois 60603

I have further caused the original of the Amended Complaint and this Certificate of Service to be served in the Office of the Regional Hearing Clerk (5MF-14) located in the Planning and Management Division, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, on the date below.

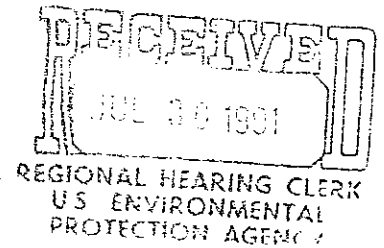
Dated this 30 day of July, 1991.

Jean M. Sharp
Jean Sharp, Office of RCRA
U.S. EPA, Region V

**ATTACHMENT 1
PENALTY SUMMARY**

Federal Regulation/ Permit Condition	Nature of Requirement	Date of Violation	Penalty Assessed
40 CFR 270.30(a)/ I.D. 9(c) and II.C	Sample log and records of monitoring and analysis	Sept. 7, 1990	\$ 300
40 CFR 270.30(a)/ II.F	Personnel Training	1986-1990	\$ 800
40 CFR 270.42	Change in emergency coordinators	Sept. 7, 1990	\$1,000

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
BEFORE THE ADMINISTRATOR



In the Matter of:)	
)	Docket No. V-W-91-R-4
Borden, Inc., Columbus)	
Coated Fabrics)	Judge Daniel M. Head
1280 North Grant Avenue)	
Columbus, Ohio)	
)	
EPA I.D. No.: OHD 004 294-351)	

MOTION FOR LEAVE TO FILE AMENDED COMPLAINT INSTANTER

Pursuant to Sections 22.14(d) and 22.16 of the Rules of Practice ("Rules"), 40 C.F.R. Secs. 22.14(d) and 22.16, Complainant, the United States Environmental Protection Agency, moves this Court for leave to file its accompanying "First Amended Complaint, Findings of Violation, and Compliance Order" ("Amended Complaint"), instanter. In further support of this Motion, Complainant states as follows:

1. Complainant filed its Complaint in this matter on March 12, 1991.
2. The Respondent, Borden, Inc., Columbus Coated Fabrics, filed its Answer on or about April 15, 1991.
3. Complainant and Respondent met for purposes of discussing settlement on June 4, 1991. The parties have subsequently held several telephone conferences, also for purposes of exploring settlement. Pursuant to these discussions, Complainant has received certain additional information from the Respondent relating to the allegations of the Complaint. This additional information has been reviewed by Complainant and, in light of that information, Complainant is filing, with this

Motion, its Amended Complaint, which drops certain of the allegations in the Complaint, subject to the approval of this Court as provided at Section 22.14(d) of the Rules.

4. Pursuant to Section 22.14(d) of the Rules, 40 C.F.R. Sec. 22.14(d), after the filing of an answer, Complainant may amend its Complaint only upon motion granted by the Court.

5. The Amended Complaint differs substantively from the Complaint only in that the Amended Complaint drops the allegations (and associated penalty) appearing in the Complaint that relate to an alleged failure by Respondent to give proper notice of a change to a portion of its permitted facility. The remaining allegations (and associated penalties) appearing in the Complaint have not been changed in the Amended Complaint (other than to correct certain minor typographical errors). Accordingly, Respondent will not be prejudiced by the filing of the Amended Complaint.

6. As a result of the settlement conference and the subsequent telephone conferences, the parties have also reached a settlement in principle of the remaining allegations in the Complaint.

7. Complainant has prepared a Consent Agreement Final Order ("CAFO") that Complainant is providing to Respondent (along with this motion and a copy of the Amended Complaint), for review and signature.

8. On June 25, 1991, Counsel for Complainant contacted Respondent regarding this Motion. Counsel for Respondent indicated that Respondent was not opposed to this Motion.

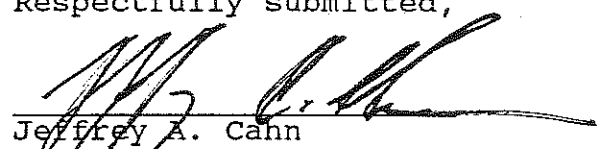
9. On Motion of Complainant, by Order of this Court, provided telephonically by this Court's clerk on June 28, 1991, the date for the completion of the parties' prehearing exchange was extended until August 12, 1990. The date for the completion of the parties' prehearing exchange has not passed.

10. Assuming that the Court grants this motion, then pursuant to Rule 22.14(d), Respondent shall have twenty (20) days time in which to answer the Amended Complaint.

11. Because this Motion is timely, because good cause exists for granting this Motion, and because Respondent does not object and will not be prejudiced thereby, this Court should grant this Motion and allow Complainant leave to file its accompanying Amended Complaint instantler.

WHEREFORE, Complainant, the United States Environmental Protection Agency, moves this Court for an Order granting Complainant leave to file its accompanying Amended Complaint instantler.

Respectfully submitted,



Jeffrey A. Cahn
Assistant Regional Counsel
United States Environmental
Protection Agency, Region V
Mail Code 5CS-TUB-3
230 S. Dearborn Street
Chicago, Illinois 60604
(FTS/312) 886-6670

CERTIFICATE OF SERVICE

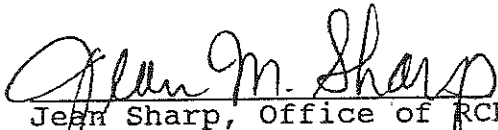
I, Jean Sharp, hereby certify that I caused copies of the foregoing Motion for Leave to File Amended Complaint Instanter to be served via first-class United States mail, postage prepaid, on this 30 day of July, 1991, upon the following:

Judge Daniel M. Head
Office of Administrative Law Judges
United States Environmental
Protection Agency
Mail Code A-110
401 M Street, S.W.
Washington, D.C. 20460

and

James F. Warchall
David J. Engel
Sheila Kennedy
Sidley & Austin
One First National Plaza
Chicago, Illinois 60603

I further certify that I caused the original of the foregoing Motion for Leave to File Amended Complaint Instanter to be filed with the Regional Hearing Clerk located in the Planning and Management Division, U.S. EPA, Region V, 230 S. Dearborn Street, Chicago, Illinois, 60604, on this 30 day of July, 1991.


Jean Sharp, Office of RCRA
U.S. EPA, Region V

PART I. BACKGROUND

FACILITY NAME BORDEN INC., COLUMBUS COATED FABRICS

FACILITY LOCATION 1280 North Grant Avenue, Columbus, Ohio

RCRA ID NUMBER OHD 004 294 351

ASSIGNEES REB Jane Neumann ORC Jeff Cahn

NATURE OF VIOLATION Violations of permit conditions

DATE OF DISCOVERY September 7, 1990

DATE OF REFERRAL October 2, 1990 () NOT APPLICABLE

ANY OTHER OUTSTANDING OR PAST ENFORCEMENT ACTIONS AGAINST THIS FACILITY:
None

PART II. RECOMMENDATION Issue 3008 Compliance Order(AMENDED COMPLAINT)

PART III. CONCURRENCES ON DRAFT

	INITIALS	DATE	AGREE	DISAGREE
PREPARER	<u>JN</u>	<u>6-21-91</u>	(✓)	()
CHIEF, RCRA ENF. SECTION	<u>JNB</u>	<u>6/21/91</u>	(✓)	()
CHIEF, RCRA ENF. BRANCH	<u>JNB</u>	<u>6/25/91</u>	(✓)	()
ASSISTANT REGIONAL COUNSEL	<u>Jeffrey H. Cahn</u>	<u>7/16/91</u>	(✓)	()

PART IV. NAME & DATE OF 3008(a)(2) NOTICE LETTER Linda Welch, OEPA

1/24/91

PART V. APPROVAL

1. PREPARER	<u>JN</u>	<u>7-17-91</u>	(✓)	()
2. CHIEF, RCRA ENF. SECTION	<u>WEM</u>	<u>7/25/91</u>	(✓)	()
3. CHIEF, RCRA ENF. BRANCH	<u>JNB</u>	<u>7/29/91</u>	(✓)	()
4. ASSISTANT REGIONAL COUNSEL	<u>Jeffrey H. Cahn</u>		()	()
5. CHIEF, S.W. & E.R. SECTION	<u>WEM</u>	<u>9-11-91</u>	(✓)	()
6. ASSOC. DIR., OFFICE OF RCRA	<u>WEM</u>	<u>7/20/91</u>	(✓)	()

NOTE: Attach sign-off sheets to yellow copy of the enforcement action.

1. Respondent has been served with a copy of the Complaint, Findings of Violation and Compliance Order (Docket No. V-W-91-R-4) as well as the Amended Complaint in this matter.

2. Respondent is a New Jersey Corporation whose registered agent in Ohio is Prentice-Hall Corporate System, 380 South Fifth Street, Columbus, Ohio 43215. Respondent owns and operates a facility located at 1280 North Grant Avenue, Columbus, Ohio (the facility).

3. Respondent admits the jurisdictional allegations contained in the Amended Complaint.

4. Respondent neither admits nor denies the specific factual allegations contained in the Amended Complaint other than the admissions made in Respondent's Answer.

5. Respondent explicitly waives its right to a hearing on the allegations contained in the Amended Complaint.

6. Should the Respondent fail to comply with any provision contained in the subsequent Final Order, Respondent waives any rights it may possess in law or equity to challenge the authority of the U.S. EPA to bring a civil action in the appropriate United States district court to compel compliance with the Final Order and/or to seek an additional penalty for the non-compliance.

7. Respondent consents to the issuance of the Order hereinafter set forth and hereby consents to the payment of a civil penalty in the amount therein specified.

8. This Consent Agreement and Final Order shall become effective on the date it is signed by the Director, Waste Management Division.

FINAL ORDER

Based on the foregoing stipulations, the Parties agree to the entry of the following Final Order:

A. Respondent shall, immediately upon the effective date of this Final Order, (except as otherwise specified below), cease all treatment, storage or

disposal of any hazardous waste except such treatment, storage or disposal as shall be in compliance with the conditions of its hazardous waste permit, or as provided in Paragraphs B through E below.

B. Respondent shall, immediately upon the effective date of this Final Order, (except as otherwise specified below), achieve and maintain compliance with the standards applicable to generators of hazardous waste.

C. Respondent shall, within thirty (30) days of the effective date of this Final Order, maintain sample logs and records of hazardous waste monitoring containing the following information:

1. Sample log:

- (a) Type of sample taken;
- (b) Method used to obtain sample; and
- (c) Date it was sent to the Stilson Laboratory for analysis.

2. Records of monitoring information:

- (a) The dates, exact place, and times of sampling or measurements;
- (b) The individuals who performed the sampling or measurements;
- (c) The dates analyses were performed;
- (d) The individuals who performed the analyses;
- (e) The analytical techniques or methods used; and
- (f) The results of such analyses.

D. Respondent shall, within 30 days of the effective date of this Final

Order, provide review of training to its hazardous waste personnel and shall document such review in its operating record. The Respondent shall, thereafter, provide such review twice yearly as required by the conditions of its permit.

E. Respondent shall, within ten (10) days of the effective date of this Final Order, submit a modification for its permit, according to procedures set forth in 40 CFR 270.42, to designate a new Emergency Coordinator and alternatives. Within twenty (20) days thereafter, Respondent shall provide the U.S. EPA with a copy of an amended contingency plan reflecting these changes.

F. Respondent shall notify U.S. EPA in writing upon achieving compliance with this Final Order or any part thereof. The notification(s) of compliance shall be attested to by a responsible official who shall state:

"I certify that the information contained in or accompanying this notification of compliance is true, accurate, and complete."

This notification shall be submitted no later than the time stipulated above to the Waste Management Division, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, Attention: Jane Neumann, RCRA Enforcement Branch, 5HR-12.

G. A copy of these documents and all correspondence with U.S. EPA regarding this Final Order shall also be submitted to Michael Savage, Assistant Chief, Inspections and Enforcement Programs, Division of Solid and Hazardous Waste Management, Ohio Environmental Protection Agency, Post Office Box 1049, Columbus, Ohio 43266-0149.

H. Respondent shall pay a civil penalty in the amount of TWO THOUSAND DOLLARS (\$2,000) within thirty (30) days of the effective date of this Final Order. Payment shall be made by certified or cashier's check payable to the Treasurer of the United States of America and shall be mailed to U.S. EPA, Region V, P.O. Box 70753, Chicago, Illinois 60673. The facility name and docket number (V-W-91-R-4) shall be printed on said payment. Copies of the transmittal of the payment should be sent to both the Regional Hearing Clerk, Planning and Management Division (5MF-14), and the Solid Waste and Emergency Response Branch Secretary, Office of Regional Counsel (5CS-TUB-3), U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604.

The U.S. EPA may collect interest on any amounts overdue under the terms of this Final Order at the rate established by the Secretary of Treasury pursuant to 31 U.S.C. Section 3717. A late payment handling charge of \$20.00 will be imposed on any late payment, with an additional charge of \$10.00 for each subsequent 30-day period over which an unpaid balance remains.

Failure to comply with any requirement of this Final Order may subject Respondent to liability for a penalty of up to TWENTY-FIVE THOUSAND DOLLARS (\$25,000) for each day of continued non-compliance with the terms of the Final Order. U.S. EPA is authorized to assess such penalties pursuant to RCRA Section 3008(c).

The Final Order constitutes a settlement and final disposition of the Amended Complaint filed in this case and the stipulations herein before recited.

Notwithstanding any other provision of this Final Order, an enforcement action may be brought pursuant to Section 7003 of RCRA, 42 U.S.C. Section 6973, or

other statutory authority should U.S. EPA find that the handling, storage, treatment, transportation, or disposal of solid waste or hazardous waste at the facility may present an imminent and substantial endangerment to health or the environment. U.S. EPA also expressly reserves the right to take any action necessary under Section 3008 of RCRA to enforce compliance with the applicable provision of Ohio Administrative Code; 40 CFR Parts 124 and 270; and this Final Order.

SIGNATORIES

Each undersigned representative of a Party to this Consent Agreement and Final Order consisting of six pages certifies that he or she is fully authorized to enter into the terms and conditions of this Consent Agreement and Final Order and to legally bind such party to this document.

Agreed to this _____ day of _____, 1991.

By _____
For Borden, Inc., Columbus Coated Fabrics
Respondent

Title _____

Agreed to this _____ day of _____, 1991.

By _____
William E. Muno,
Associate Division Director
Office of RCRA
Waste Management Division
U.S. Environmental Protection Agency
Region V, Complainant

The above agreed and consented to, it is so ordered

this _____ day of _____, 1991.

David A. Ullrich, Director
Waste Management Division
U.S. Environmental Protection Agency
Region V

IN THE MATTER OF:
BORDEN, INC., COLUMBUS COATED
FABRICS
1280 North Grant Avenue
Columbus, Ohio
DOCKET NO. V-W-91-R-4